



Steve Williams
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October 11, 2004

RE: Idaho Conservation League, The Wilderness Society and Idaho Rivers United comments on the Red Pines Project Draft Environmental Impact Statement

Dear Steve:

Thank you for allowing us to comment on the DEIS for the Red Pines Project. The Idaho Conservation League (ICL), The Wilderness Society (TWS) and Idaho Rivers United (IRU) have a long history of involvement with forest management issues around the state, and specifically in the Nez Perce National Forest. ICL, TWS and IRU staff members have visited the project area on numerous occasions with USFS staff, have tracked the project since its inception, and are familiar with the project.

As Idaho's largest state-based conservation organization, the ICL represents over 3,000 members, many of whom have a deep personal interest in protecting our air, water, wildlands, and wildlife from the harmful effects of both uncharacteristic wildfire and habitat damage from timber harvesting in inappropriate areas.

TWS has long been involved in the management of Idaho's national forests, including the Nez Perce National Forest. TWS seeks to insure that natural resource management decisions are based on sound science and that the ecological integrity of the public lands is preserved.

Idaho Rivers United represents over 2,800 members, many of whom utilize the Nez Perce National Forest for hiking, boating, fishing and other recreational and scientific pursuits. Idaho Rivers United's mission is to protect and restore the biological integrity of Idaho's rivers. Members and staff of IRU have a particular concern for restoring water quality and native fish habitat in the Nez Perce National Forest, and were active participants in the development of the TMDL for the South Fork Clearwater River and the draft State Comprehensive Basin Plan.

We believe that the large amount of road construction and logging proposed are completely inappropriate given the degraded condition of this drainage, especially with the high quality potential for fisheries and wildlife habitat in the area.

Response 14-1. Acknowledge Comment.

Response 14-2. Acknowledge Comment.

Response 14-3. degraded drainages.

The analysis of each alternative displays the effects to various resources. Standards and guidelines from the Forest Plan will maintain effects within accepted limits of change (refer to regulatory framework. The proposed restoration projects and mitigations are designed to offset potential damage from logging and result in an upward trend in aquatic habitat carrying capacity in the affected watersheds (Alternative E).

As stated in our scoping comments on this project, and on other similar projects in the area, we believe that new road construction, even temporary, is simply not a viable option given the Forest Service's own scientific evidence showing the road system's effect on listed fish species in this watershed. The activities described do little to protect homes and communities from fire in any meaningful way, and may in fact exacerbate fire danger, severity and intensity.

Many of the streams in the project area are failing to meet criteria established in the Forest Plan, Biological Opinions, PACFISH/INFISH amendments, and/or South Fork Clearwater River Total Maximum Daily Loads (TMDL). These criteria include, but are not limited to Cobble Embeddedness, Pool:Riffle Ratios, Large Woody Debris, Percent Surface Fines, Sediment Loads, and Stream Shade. Further, where any data exists to determine the attainment of these criteria, much is outdated and stale. It is imperative that a positive upward trend is identified (through statistically significant means) prior to any activities taking place. Further, continuance of this upward trend must be indicated in order to proceed with these activities.

In discussions with project staff, it was stated that none of the alternatives displayed in the DEIS can be reasonably expected to be selected. As such, we request that a Supplemental Draft Environmental Impact Statement be prepared in order to describe alternatives that may actually be implemented. Otherwise, constructive comments and input from our organizations is difficult, if not impossible, in order for us to gauge the appropriateness of detailed alternatives.

There are tremendous opportunities for restoration projects in this area that could reduce sediment loads, provide logs for local mills, and reduce the future risk and severity of fires. We appreciate the efforts to decommission 96 miles of roads, but these efforts need to be expanded significantly and guaranteed throughout the watershed. If there is to be any type of project, it needs to be based off of existing road systems, close additional roads, and be located within the wildland urban interface in order to provide efficient and effective protection from wildfires. With regard to decommissioning, specific information (i.e. mileage and location) must be provided which details the specific closures, gates, obliteration, abandonment, or other actions taken.

In light these factors, we strongly encourage you to develop and analyze a Watershed Restoration/Defensible Space Alternative. This alternative should be displayed and offered for public review and comment in a Supplemental Draft Environmental Impact Statement.

Finally, as stated previously, we have strong objections to the proposed Forest Plan Amendments and urge you to abandon these efforts and instead proceed with a project that complies with existing direction in the Forest Plan. Especially with a revised Forest Plan in development, it is inappropriate to proceed with significant amendments that would have detrimental impacts on forest, stream, wildlife and fishery resources.

Please send our organization copies of subsequent NEPA documents. Feel free to contact any of us if you have any questions about these comments.

Sincerely,
Jonathan Oppenheimer
Idaho Conservation League

/s/ Craig Gehrke
Craig Gehrke
The Wilderness Society

/s/Jenna Borovansky
Jenna Borovansky
Idaho Rivers United

Response 14-4 new roads. Please see Response 14-94.

Response 14-5. Defensible space. Please see Response 14-27.

Response 14-6. Forest Plan. Please see Response 14-22.

Response 14-7 Biological Opinion. Please see Response 14-22

Response 14-8 PACFISH/INFISH. Please see Response 14-22, 14-34, 14-35, 14-42.

Response 14-9 SFCWR- TMDL. Please see Response 14-22, 14-13, 14-32.

Response 14-10 Data for criteria. Please see Response 14-22, 14-42 and 14-43.

Response 14-11. Upward trend. Please see Response 14-22 and 14-63, 14-85 and 13-11.

Response 14-12. SEIS. Please see Response 14-27.

Response 14-13. Restoration opportunities. Please see Response 14-21, 14-48 and 14-104.

Response 14-14. existing roads. Please see Response 14-22, 14-30 and 14-95.

Response 14-15. decommissioning road details. Please see Response 14-22, 14-94, 14-95, Appendix C and H.

Response 14-16. Alternatives. Restoration/Defensible Space. Please see Response 14-26 and 14-27.

Response 14-17. Forest Plan Amendments. Please see Response 14-37 and 14-85.

Purpose and Need

The project's stated purposes, to remove dead and dying trees, reduce timber stand densities, reduce ladder fuels, reduce risk of high intensity fires, and maintain fire resistant species need to be balanced with other mandates in the Forest Plan regarding watershed, species, and soil protection. Continuing shortsighted logging and road construction in this heavily impacted area will only exacerbate water quality, wildlife habitat, and soil quality problems. Unfortunately, this project is based on short-term economics and political pressures with disastrous ecological consequences, which will negatively affect the region's long-term economy.

The purpose to reduce potential future fuel loading fails to meet guidance in the Forest Plan. The Forest Plan gives direction to protect resource values through cost effective fire and fuels management (Forest Plan page II-2). By treating areas beyond the wildland-urban interface (WUI), the Forest Service is being grossly inefficient and negligent in hazardous fuels reduction efforts. The proposed activities will do little, if anything, to safeguard the community of Elk City from wildfires and stands to increase the hazardous fuel load and create a false sense of security, contrary to Forest Plan direction.

The feasibility of carrying out the project, due to economics, is also limited due to the low value and high costs associated with the project.

Response 14-18. Purpose and need.

We agree that the status quo is not an option, but we disagree with the assertion that the project will result in disastrous ecological consequences. Restoration activities are included for all watersheds affected by the project. Along with activities responding directly to the purpose and need are a suite of watershed and fish habitat improvement projects. These include road decommissioning, soil restoration culvert removal and replacements, mine site reclamation, riparian enhancements and instream improvements, all designed to improve fish habitat and water quality in these important streams. Refer to the FEIS, Appendix H for more information. This restoration work will also contribute to the economic and social well being of the local communities both in the short term and in the long term.

With respect to wildlife species, the project is expected to modestly improve habitats for some species (elk, wolves), and may serve to reduce future risks of converting some old growth stands in near adjacency to treatment units. In all, none of the activities would "likely to adversely affect" any terrestrial federally listed species or their habitats. Refer to the Biological Assessment for the FEIS for details.

Response 14-19. Fire, fuels.

This proposal is not contrary to the Forest Plan because: resource values do not only refer to the wildland urban interface, but also refers to timber, air quality, habitat, recreation opportunities, etc. The proposed treatments would modify fire behavior by lowering fire intensities for fires occurring in the treatment areas. This would give suppression resources the opportunity to utilize the treatment areas during suppression activities, which would allow for the control of a fire at a smaller size and/or less cost.

Response 14-20. Economics.

This comment is correct and is discussed and displayed in the Timber Revenues and Costs discussion starting in the FEIS, Chapter III, Section 3.18.

A better way to contribute to the economic and social well being of the local communities is to repair the decades of abuse the landscape has suffered and restore the watershed so that it supports thriving populations of Chinook Salmon, Steelhead Trout, Bull Trout, Lampreys and other species. There are decades worth of restoration projects in this area needing skilled forest workers. In addition, fishing continues to bring significant income to the local economies.

While some additional value might be recovered from salvaging trees, any efforts must be based off existing road systems and be located in drainages that fully meet standards and objectives in the Forest Plan, South Fork Clearwater TMDL, PACFISH/INFISH and other documents.

Response 14-21. economic and social well being.

This project includes a range of watershed and fish habitat restoration projects identified in the FEIS. Refer to Chapter II, Section 2.3.3 for a summary of watershed restoration improvements. In addition, This work includes decommissioning road, soil restoration, stream crossing improvements, riparian or instream enhancements, instream structure maintenance, reclamation of hard rock mine sites and rock pits, and improvement dispersed recreation sites. Appendix H of the FEIS details the restoration planned under each action alternative. We acknowledge implementation of these projects will take time and funding.

Response 14-22. Use existing roads. Location of salvaging trees.

This project is consistent with Forest Plan direction, through use of amendments as needed, and conforms to all applicable standards and guidelines. A restoration only alternative was considered but not analyzed in detail because it would not be responsive to the Purpose and Need of this project.

All action alternatives base salvage activities from existing roads, and temporarily extend existing roads or add spurs to reach treatment areas needed to respond to the purpose and need of reducing fuel loads (FEIS, Chapter II, Section 1.5). All alternatives were developed to ensure that Forest Plan standards, goals and objectives for certain components of ecosystem quality and integrity were addressed (FEIS, Chapter III). Reconnaissance surveys identified old growth, riparian areas, sensitive slopes, areas of prior soil impacts, watershed improvement needs, unroaded areas, and certain forest vegetation components at risk from fire suppression and succession. Extent and location of temporary roads were constrained to avoid stream crossings and proximity to streams. Analysis of effects (FEIS, Chapter III) will determine the extent of treatment that each drainage can support within the standards and guidelines.

Definitions

Subsequent NEPA documents need to clearly define the following terms: “dead and dying” (Page I-2).

The presence of some percentage of dying or at risk trees is not sufficient as a reason to log the entire stand. Not all Lodgepole Pine trees will succumb to the Mountain Pine Beetle and those that survive could potentially provide a genetic resistance to beetles in the future. This genetic resistance to beetles would be lost if the trees were logged.

Response 14-23. definitions, dead and dying.

Comments acknowledged. Also see response 14-24 for genetics discussion.

Dead conifer trees in the project analysis area are evidenced by having completely dead foliage (needles), or nearly, to total lack of foliage (with the exception of western larch, a deciduous conifer which annually sheds its needles), including total lack of viable buds. After one to several years bark slippage, and checking of the wood also may be evident on the tree boles.

The term “dying” refers to the cessation of transport of water and nutrients within a tree. The first sign of beetle caused mortality is generally discolored foliage. Needles on successfully infested trees begin fading and changing color several months to one year after the trees have been attacked. The needles change from green to yellowish green, then sorrel, red, and finally rusty brown. Fading begins in the lower crown and progresses upward. Besides having pitch tubes on the boles, successfully infested trees will often have dry boring dust, similar to fine sawdust, in bark crevices and around the base of the tree. Sometimes however, infested trees can have boring dust, but not pitch tubes. These trees, called “blind attacks” are common on stressed trees during drought years when the trees produce little pitch. When the beetles attack, they carry blue-staining fungi into the tree. After one to several months, the sapwood begins to discolor.

Approximately 6% or less of the project analysis area acreage would be subject to fuel reduction treatments resulting from implementation of this project, and not all trees would be removed from the treated areas (see FEIS, silvicultural treatment description, Appendix E-13). In addition to remaining trees left uncut in treated areas, large blocks of untreated forest will remain as a seed source adjacent to the treated areas, retaining genetic diversity of tree species adapted to conditions prevalent in the project area. Large trees, notably ponderosa pine or western larch would be retained in mixed conifer stands in the treated areas.

Refer to the first two stated objectives of this project (FEIS, Chapter I, Sections 1.2 - 1.3). The vast majority of all acres proposed for treatment regardless of aspect are in the mixed severity or lethal fire regime. Silvicultural prescriptions are based on relevance to meeting the stated objectives within the purpose and need. How well a stand meets criteria depends upon the vegetative condition of the stands as well as the juxtaposition to the WUI, past treatment areas and determined fire protection areas. Social and economic values in the WUI are not the only resources at risk from wildfire in the project area.

Response 14-24. vegetation, risk of dying.

This project is treating 6 percent or less of the project area. The disturbance process of insect infestation is also occurring on untreated acres. Trees are prescribed to be left in all stands if still alive to meet green tree replacements for snags, including proposed clearcut units. In addition, felled trees would provide a seed source for reestablishment of genetically related lodgepole pine. As a result, it is highly unlikely that tree genetics would be measurably affected in the project area.

Other tree species, which are intermixed with Lodgepole, and are not susceptible to Mountain Pine Beetle, should not be logged, as is proposed in the excessive clearcut and shelterwood prescriptions described in the DEIS.

Alternative Development

The range of alternatives fails to recognize the enormous need for restoration in the project area. All of the proposed alternatives should have addressed the need for environmentally sustainable projects that deal with the extensive legacy problems in this area. The Forest Service should have examined a range of restoration alternatives with greater amounts of road decommissioning, culvert replacement, and other activities to reduce sediment and restore fisheries. While these alternatives would not harvest as much timber as the proposed action, they would still provide timber for local mills.

Defensible space projects should also be considered in future planning documents, as the alternatives displayed in the DEIS fail to meet the purpose and need to reduce fuel loads for public safety. **On the basis of these considerations alone, a Supplemental DEIS is clearly warranted which considers a Defensible Space alternative.**

The DEIS also discussed Fuel Reduction Effectiveness and states as one of its purposes to “Reduce the risk of high severity fires.” Much of the project area has already been fragmented through past logging, road construction, thinning, natural and human burns, dredging and other disturbances. According to the DEIS, 30,200 acres (III-142) have been logged in the watershed, and 588 miles of road (III-251) have been inventoried. As a result, historic management has degraded the watershed, and landscape and continuing shortsighted logging and road construction will add to the degraded condition of the landscape. With the proposed Red Pines action, we are curious what the end result would look like, and whether or not the Forest Service foresees additional projects in the near future.

Response 14-25. Vegetation, species, harvest.

Please refer to the purpose and need (Chapter 1). In addition to lodgepole pine, other species may be removed to reduce stand densities and ladder fuels, risk of high severity fire, and enhancement of existing fire resistant species in the Red Pines Project area.

Response 14-26. Alternatives. Range of alts. Amck 2-23

An adequate range of alternatives was considered. A restoration only alternative was considered but not analyzed in detail because it would not be responsive to the Purpose and Need of this project. (Refer to FEIS, Chapter 1.) The proposed Alternatives B, C, D, and E provide a range of restoration activities.

Response 14-27. alternatives, defensible space.

While it is acknowledged that an efficient and effective method to protect structures is by conducting work within the home ignitability zone, structure protection is not the primary purpose and objective of this project. Additionally, the Red River Defensible Space project, which removed ladder fuels and surface fuels within 200 feet of private structures adjacent to Forest Service managed land, has already been completed around structures located within the Red River Drainage.

A Supplemental DEIS will not be prepared at this time.

Response 14-28. fuels, future foreseeable.

The long-term vision for the project area is being addressed in multiple planning efforts. All will require integration of complex terrestrial, aquatic, and social concerns, and integration with BLM activities. In Red River, concerns include high aquatic potential, past management impacts, mixed and stand replacing fire regimes, intermingled homes and communities, and nearness to wilderness and roadless areas.

At the state and national scales, the Idaho Cohesive Strategy (http://www.fs.fed.us/r4/id_fire_assessment/descriptions.html) and LANDFIRE (<http://www.landfire.gov/>) are projects designed to develop consistent and accurate data of vegetation conditions, fire fuels, risks, and ecosystem status at the national, regional, and local scales for implementation of the National Fire Plan. These projects could be used to prioritize areas for fuel treatments, which might target areas within these watersheds. However, neither project provides guidance on landscape design or how to reconcile conflicting terrestrial, aquatic, and social values.

In the short term, and at the forest scale, a vegetation management strategy is being developed that considers, by subwatershed, issues of aquatic values and sensitivity, and vegetation and fire risk in comparison to natural disturbance dynamics. The social context and the suite of appropriate management tools are also considered. This is in progress.

Water Quality

Decommissioning roads should be the top priority for the Forest and especially in the Red River drainage with an overall road density of 3.67 mi/mi² (III-251). It is unacceptable that road construction is proposed in an area that is already heavily roaded, and where water quality has been significantly degraded because of excessive road densities. The DEIS, and other documents prepared in the last decade, consistently highlight the problem of excessive roads, their impacts on water quality, wildlife and other resources. On page III-47, the DEIS notes, "The density and distribution of roads within the subwatersheds indicate there is a high probability that the current hydrologic regime is substantially altered." The DEIS goes on, on page III-48, to indicate that roads within riparian areas are a particular problem in the project area. Of the 18 subwatersheds, only one is rated as moderate condition (only missing the cutoff for poor condition by .1 mi/mi²), and the remaining seventeen are in poor condition. Many of these, exceed the streamside road density standard cutoff of >2 mi/mi² by two to three times. Even with the planned decommissioning, it is inappropriate to construct temporary roads in the project area, much less 36 miles of new temporary roads.

Considering that the DEIS concedes that there will be a short-term increase in sedimentation, construction of additional roads (even temporary ones) in the area is inappropriate and should not be approved. Road construction is regarded as the most important factor contributing to degradation in these watersheds. Even with "Temporary Roads" the most significant addition of sediment to streams is during years 1 and 2 and following obliteration¹. While our organizations generally prefer temporary roads to permanent ones, they are not appropriate in these already heavily roaded and degraded ecosystems. In fact, according to this research, over a seven-year period, 77% of soil loss occurs within the first two years of road construction. Therefore the impacts from road construction, even temporary ones, are significant and have very real potential to significantly impact fisheries habitat.

¹ Potyondy, J.P., G.F. Cole, and W.F. Megahan. 1991. *A procedure for estimating sediment yields from forested watersheds* (Pages 12-46 to 12-54). In Proceedings: Fifth Federal Interagency Sedimentation Conference. Federal Energy Regulatory Commission, Washington, D.C.

In the longer term, forest plan revision may provide additional guidance that helps establish objectives for watershed condition and landscapes considering terrestrial, aquatic, and social factors.

Most locally, a watershed assessment would be the typical means in the Red River watershed to more intensively examine existing conditions, natural pattern and process, and make integrated recommendations that would guide landscape design and watershed restoration.

Response 14-29. Road decommissioning, priorities

Alternative E was developed between the DEIS and FEIS in large part to address the issue of upward trend in aquatic habitat carrying capacity. This alternative reduced short term impacts by dropping certain fuel treatment units and associated temporary roads. It also increased the amount of watershed restoration projects, including additional road decommissioning and soil restoration. Overall, the project is an attempt to balance the need for hazardous fuel reduction with the need to improve watershed and fish habitat conditions.

Response 14-30. Temporary road, water quality.

The areas available for prescribed treatment activities that are accessible from existing roads are insufficient in size and location to satisfy the project's purpose and need and to contribute to the economic viability of the project. The important points to take from these discussions are: (1) The areas available for prescribed treatment activities that are accessible from existing roads are insufficient in size and location to achieve the fuels reduction objectives of the project (Chapter II); (2) all temporary roads will be decommissioned within three years following their construction (refer to FEIS, Chapter II); and (3) every effort is made to limit unauthorized incursions on decommissioned roads. Temporary road construction and subsequent decommissioning would be consistent with all applicable BMPs to minimize adverse effects to watershed health.

The fuels reduction portion of the project is focused primarily on removing dead, down and dying lodgepole pine, which must be removed in quantities and at locations sufficient to create the fuel breaks necessary to achieve the project objectives (FEIS, Chapter I).

See also FEIS, Chapter III, Sections 3.5 and 3.6.

The road erosion coefficients cited from Potyondy, et al are the same as those used in this analysis. The temporary roads are relatively short in length and are mostly in mid and upper slope positions. Incursions into RHCAs have been minimized, especially in Alternative E.

Temperature has been identified as exceeding Idaho Water Quality Standards at certain times of the year. Increased sedimentation could alter the channel morphology, and logging in the Riparian Habitat Conservation Areas (RHCAs) could further increase water temperatures in the streams. In order to comply with the South Fork Clearwater River Subbasin Assessment and TMDL, and the listing of the Red River as a Special Resource Water, the Forest Service must prepare a Tier II Antidegradation Analysis that demonstrates that State Water Quality Standards are met and that the TMDL is not violated. With the existing "poor" stream conditions, this project, as designed, will result in unacceptable impacts.

The South Fork of the Clearwater fails to meet water temperature and sediment standards for beneficial uses under the Clean Water Act. At page (III-39), the DEIS notes that "No specific targets were set for tributaries, but it was recognized that much of the sediment yield reduction would need to take place in the tributaries." The Proposed Action undermines the intent and goal of the TMDL by proposing activities that the DEIS acknowledges will increase short-term sedimentation. Further, as is documented in the DEIS, due to the existing poor condition of the streams, the low gradients of the streams, the magnitude of the sediment, and the anticipated residence of fine sediments, poor conditions will be maintained, and likely degraded as a result of the project. This is unacceptable, especially in areas that provide such important habitat for listed Threatened, Endangered and Sensitive species.

The TMDL requires a 25% decrease in sediment, most of which would need to take place in tributaries such as the Red River and its tributaries. The DEIS fails to evaluate whether TMDL sediment guidance will be adhered to with regards to temperature, shade, and sediment. The Forest Service must evaluate whether the planned harvest and road construction in these drainages is legal; given the large portion of the South Fork Clearwater sediment budget these watersheds occupy.

The Forest Service should provide a detailed analysis of the sediment sources comparing contributions from road decommissioning and new road construction for each alternative. Predictions of sediment delivery to streams need to take into account the fact that PACFISH and INFISH buffers rely on intact buffer zones not impacted by previous road construction, harvesting, and mining activities.

Response 14-31. water quality, temperature

Water temperature increases are not predicted to occur as a result of this project. Increases in sediment yield are not estimated to be of a magnitude that would result in changes in channel morphology. Draft guidance posted on the IDEQ website on April 8, 2004, indicates that short-term increases in sediment yield may be allowable as long as beneficial uses are not impaired. Consultation is underway with the IDEQ to determine whether the new Alternative E in the FEIS complies with the South Fork Clearwater River TMDLs.

Recent consultations with USEPA and IDEQ have indicated that the Antidegradation Tier II analysis is not applicable to this project. This procedure applies in the case of waters exceeding State Water Quality Standards. In the case of Red River and the South Fork Clearwater River, the TMDLs supplant the antidegradation provisions.

Response 14-32. TMDL.

The implementation plan for the South Fork Clearwater River TMDLs is scheduled for completion in 2005. However, the IDEQ has recognized that short term increases in sediment yield may be allowed in a 303(d) listed water body listed for sediment, as long as a net decrease in sediment yield is shown and beneficial uses are not impaired. We believe that this Project meets these criteria. These concepts are documented in a November 4, 2003, letter from IDEQ to the Idaho Panhandle National Forests and in draft guidance posted on IDEQ's website on April 8, 2004. Consultation is underway with the IDEQ to determine whether the new Alternative E in the FEIS complies with the South Fork Clearwater River TMDLs.

Response 14-33. TMDL

This project is predicted to result in a net decrease in sediment yield to the South Fork Clearwater River over time (refer FEIS, Chapter 3). An implementation plan for the South Fork Clearwater River TMDLs is scheduled to be completed in 2005. No single project will be expected to achieve the entire TMDL sediment reduction goal. However, this project will contribute toward that goal. See also responses 14-31 and 14-32.

Response 14-34. pacfish, infish, buffers.

The sediment yield analysis is done by summing the effects of each project activity that could be modeled. A summary of sediment yield from new road construction, road decommissioning and other project components for the selected alternative is found in the Biological Assessment. We do not believe it necessary to disclose this level of detail for each alternative. Since this information is not directly related to the condition of PACFISH RHCAs, it was determined that it was unnecessary to provide this level of detail for each alternative. INFISH buffers do not apply to the Nez Perce National Forest.

The Forest Service should prescribe new buffer zones, which will adequately protect riparian areas from sedimentation stemming from road construction and management-related mass wasting events.

The Forest Service should disclose the ECA and sediment yield for watersheds adjacent to the project area, and establish sediment budgets for each watershed. The Forest Service must to compare the time required for the sediment loads and ECAs to drop to conditions where beneficial uses are met for all alternatives.

The Forest Service should not approve any amendments to the Forest Plan to allow for violations of sediment standards in order to exceed Forest Plan guidelines. Other amendments, which suspend or modify upward trend requirements, and which reduce protections for soil resources should similarly not be considered.

The Forest Service must assume that concurrent negative impacts will continue to occur off National Forest lands, i.e. “accelerated private land timber harvesting and road building is occurring in American River watershed.” (Red River Salvage EA, p. 59) and factor these impacts into the cumulative effects analyses.

The Forest Service must provide adequate analysis of the cumulative impacts of the project on the degraded conditions in the affected watersheds.

Response 14-35. RHCA buffers.

The Interim Strategies for Managing Anadromous Fish-Producing Watersheds on Federal Lands in Eastern Oregon and Washington, Idaho and Portions of California (PACFISH) and supporting literature (February 24, 1995) establishes default Riparian Habitat Conservation Areas (RHCAs) which were shown to protect streams from management activities. These RHCAs have been incorporated into the design criteria for this project (FEIS, Chapter II, Section 2.3.4).

Response 14-36. water quality, ECA, sediment yield.

The ECA and sediment yield analyses in Chapter III, Section 3.5 of the FEIS encompasses the entire watershed Red River. The cumulative effects sediment yield analysis for the South Fork Clearwater River covers all known activities that could be modeled upstream of the Nez Perce National Forest boundary, including those watersheds adjacent to Red River. The time frame for this part of the analysis is through 2012. At this point, Red Pines post-project sediment yield is assumed to have stabilized. ECA continues to recover gradually over time as the forest canopy regrows.

Response 14-37. Forest Plan Amendments. Sediment yield, soils.

See Response to 1-2 and 3-25.

Response 14-38. water quality, cumulative impacts.

Amendments to the Forest Plan were carefully considered. In some cases the amendments are needed to update information found in Appendix A of the Forest Plan. In other cases, the amendments are needed in order to strike a desired balance between the vegetation management and aquatic objectives. The cumulative effects of activities occurring on private lands are accounted for in the FEIS, to the extent that information has been obtained from 2002 aerial photographs and from field investigations in the area through 2003.

Response 14-39. cumulative effects.

See Response 14-38. The cumulative effects discussion was supplemented with additional analysis in the FEIS. Not all ongoing and proposed activities are modeled in the sediment analysis. The types of activities and effects that are modeled are disclosed in Appendix H. The concern regarding compliance with the South Fork Clearwater River TMDLs is discussed above in the responses 14-31 through 14-33.

The reliance of the project on the NEZSED model is problematic. The Forest Service must consider and discuss, in more detail, limitations and requirements of the model to provide accurate estimates for sediment delivery. The analysis also must include consideration of all proposed road reconditioning using the NEZSED model. At page II-55, the DEIS states, “Of the proposed 90 miles of road reconditioning...only 19.8 miles were calculated in NEZSED...” This is entirely inappropriate and the Supplemental DEIS must consider all road construction and reconstruction using the NEZSED model.

Past experience and monitoring associated with the NEZSED model should be provided in the Supplemental DEIS in order to allow for the appropriate consideration of the models shortcomings, especially for a project of this magnitude.

According to the South Fork Subbasin Assessment and TMDL, the Red River watershed “has been subjected to one of the highest frequencies of disturbance and a reduction in habitat condition.” The assessment goes on to say, “The watershed has changed...to homogeneously degraded habitat. The ability of aquatic species to persist as well as rebuild or repopulate areas from local stronger populations has been reduced” (Subbasin Assessment and TMDL, page 20).

It is unclear from the DEIS, what analysis is being relied upon to conduct logging and road construction in RHCAs. A Watershed Analysis is required, which specifically addresses boundaries for RHCAs, which demonstrates that actions would maintain compliance with Riparian Management Objectives, and which shows that current and future large woody debris requirements are met. All of the RMOs are exceeded in most stream reaches, indicating a distinct probability that additional disturbance within RHCAs would violate PACFISH. The DEIS refers to both the Red River EAWS and a draft Watershed Analysis as the basis for logging in RHCAs. This must be clarified in subsequent NEPA documents. Because of the conflicting statements in the DEIS, and the fact that the Red River Ecosystem Assessment at the Watershed Scale (EAWS) has not been made available for public review, it is uncertain whether any of these documents are in compliance with PACFISH and INFISH standards.

Response 14-40. water quality, NEZSED, modeling.

The section on model limitations and tests, found in Chapter 3 of the DEIS, has been expanded in Appendix H of the FEIS. The results of four NEZSED model tests are discussed, including a new test by Thomas and King (2004). WATBAL and NEZSED share certain common ancestry with regard to surface erosion sediment yield and equivalent clearcut area computations. They are different in that NEZSED does not estimate activity-related mass erosion events greater than 10 cubic yards in size, nor does NEZSED compute water yield increases. NEZSED coefficients show that sediment yield from roads decreases after initial construction, but not to zero.

The protocols for modeling effects of road reconditioning result in increased sediment yield if the road receives either a moderate or major reconstruction. Routine maintenance and minor reconstruction is assumed to result in only minor sediment yield increases that are not modeled. This explains the seeming discrepancy between total miles reconditioned versus those miles for which increases in sediment yield were modeled.

The sediment yield analysis in the DEIS or the FEIS does not rely solely on NEZSED. It used a combination of field data, observations, modeling and professional judgment to disclose current conditions and estimated effects of the alternatives.

Response 14-41. monitoring, NEZSED.

Please see response 14-40.

Response 14-42. EAWS, Harvest in RHCA.

This project is consistent with and guided by management direction in the Nez Perce National Forest Land and Resource Management Plan (Forest Plan). Current scientific information from assessments (SFLA and Red River EAWS) improves and enhances our understanding of ecological interactions and the associated management implications.

The South Fork Clearwater Landscape Assessment and the Red River EAWS (draft) are an analysis, not a decision-making document. While Red Pines EIS refers to this analysis, it is not being tiered to as a decision document. Principally, it is serving as a tool to assess the biophysical and social conditions of the South Fork River and Red River. On a broad scale, this analysis identified opportunities to improve existing conditions. Decisions concerning these opportunities, however, are left to a site-specific NEPA analysis (such as this).

We agree that varying references to the Red River EAWS are confusing. The Red River EAWS is the same thing as the draft Watershed Analysis. A consistent reference to this document is included in the FEIS as USDA-FS 2003a. A final version has been made available to the public on the Nez Perce National Forest website.

Changes in default RHCA widths are not proposed in the Red Pines FEIS. Compliance with regulatory framework, including PACFISH and the Forest Plan Biological Opinions, is included in the Fisheries section of the FEIS. See Response 14-34. INFISH buffers do not apply to the Nez Perce National Forest. Salvage cutting in RHCAs was identified as a significant issue during project scoping. Alternatives were developed that respond to this issue. Salvage cutting in RHCAs is not included in Alternatives C, D, and E.

The reliance on removal of dead trees in RHCAs fails to meet the test of common sense. Dead trees are those most likely to fall and contribute to large woody debris (LWD) in streams. Only monitoring at Ditch Creek has shown compliance with the LWD requirement. The removal of dead trees, even outside the 80-100 ft. zone, could reasonably reduce the likelihood for recruitment of LWD in the streams. Once trees are on the ground, it is likely that they will roll downhill, towards the stream and contribute to LWD. Further, when trees outside the 80-100 ft. zone fall, they could knock other trees into the stream. Finally, logging associated impacts related to logging in the RHCA could likely include increased sedimentation and decreased pools. Therefore, assumptions that logging within the RHCAs would not retard attainment of RMOs is faulty.

It is inconceivable that the Forest Service would proceed with a project that would a) degrade watershed conditions in a 303(d) listed watershed which provides habitat for species listed under the Endangered Species Act, b) amend the Forest Plan to allow for downward and static trends in prescription watersheds, c) allow for logging and new road construction within RHCAs when RMOs are not being met, and d) continue to implement activities which have been proven to contribute to the above-mentioned problems. Amazingly, this is exactly what the NPNF is proposing in the case of the Red Pines project.

Response 14-43. Fisheries. Silviculture, Harvest in RHCA, RMO.
See Responses 14-34 and 14-42.

As discussed in the FEIS, given widespread mortality of lodgepole pine in riparian areas, recent recruitment of large woody debris is evident in many streams. In addition, we are proposing to introduce large woody debris into many stream miles under Alternatives B, C, D, and E. This indicator has improved or is poised to improve in most streams in the analysis area.

We disagree that removal of dead trees outside of one tree height distance would reduce recruitment in streams. It is unlikely that trees falling on the ground outside of the 80 – 100 feet distance would roll into the stream because slopes are not steep enough, other trees would effectively block them, and trees with root wads do not roll easily regardless of other factors. As for trees that could fall and thus knock other trees into the stream, the chances of this happening more than once or twice are quite remote, considering the crown (or lack thereof) and diameter of a dead lodgepole pine. Plus, any tree that could be knocked over by a dead lodgepole would likely fall by itself.

A discussion of the effects to the LWD indicator from implementation of Alternative B is included in Section 3.1.8.1 of the FEIS.

Sediment from all harvest units has been modeled by NEZSED, and the results are displayed in the FEIS. The effects of short-term increases in sediment yield are included in the analysis. Design criteria preventing heavy equipment from operating in RHCAs would avoid or minimize ground disturbance in RHCAs.

Fuel reduction and timber harvest activities in RHCAs were identified as significant issues during project scoping, and alternatives were developed to address them. No harvest or removal of fuels is proposed under Alternatives C, D, and E.

Response 14-44. 303d streams. See Responses 14-31 through 14-33.

Response 14-45. Upward trend, amendments. See Responses 1-4 and 1-2.

Response 14-46. Harvest in RHCA, Roads. .Please see Response 14-34, 14-42, 14-43, 13-23, and 4-7.

Response 14-47. Implementation. . See Response 1-2 and 1-4.

Watershed Restoration

The restoration package associated with the project should be significantly increased and guaranteed. Restoration of the watershed should be the highest priority for the watershed given the South Fork Clearwater River Landscape Assessment identifies Restore Aquatic Processes (Very High Priority) as the area theme for the Red River Ecological Reporting. Instead, the project will exacerbate poor conditions in the watershed and will result in unacceptable impacts to water quality. As is described in Appendix H, “the Red Pines project is not expected to result in an upward trend in aquatic condition.”

Response 14-48. restoration, treatments, priorities.

A new Alternative E was developed between the DEIS and FEIS, in large part to address the issue of upward trend in aquatic habitat carrying capacity. This alternative reduced the short term impacts through a reduction in fuel treatments and temporary roads, while increasing the restoration package in terms of road decommissioning and soil restoration. Please also refer to response 14-21 in regard to the amount of watershed restoration improvement proposed with Alternative E.

Most restoration work associated with this project will be accomplished through the use of various contracting mechanisms. Some of the work, streamside planting for example, may be accomplished through participating, volunteer, and challenge cost-share agreements.

The various types of contracting authorities being considered to implement the project include stewardship, service, and timber sale contracts, each of which offers a different opportunity to apply funds or contract specifications toward completing restoration activities.

At this time, a guarantee of funding is not possible. However, we can say with a high degree of confidence that restoration funds will be sought and made available from a variety of sources over the life of the project, as planned.

Funding Sources

- Appropriated funds have been requested for Fiscal Year 2005 and beyond to accomplish restoration work in the upper South Fork Clearwater River, including the Red Pines Project area.
- The North Central Resource Advisory Council (RAC) and has the capability to fund a significant portion of the restoration once the Project is approved.
- Road improvements and a portion of the existing road decommissioning could be accomplished through timber sale contract provisions where such roads would be used for hauling and removing forest products.
- Where forest product revenues are projected to exceed operational logging and site treatment costs, stewardship contracting authorities could be used to allow the Forest Service to direct those revenues toward restoration activities.
- A substantial portion of the restoration work fits well under partnership and grant opportunities with:
 - potential sources of funding for restoration activities is the Pacific Salmon Recovery Fund (PSRF).
 - Restoration work associated with this Project, once approved, will be incorporated into the South Fork Clearwater River TMDL implementation plan, which is under development by the SFCR Watershed Advisory Group.
 - Many of the proposed restoration projects would be competitive for BPA funds and work could be accomplished in partnership with the Nez Perce Tribe.

In the event of significantly changed conditions due to natural events related to large floods, wind, or fire affecting the project area, the project would be reevaluated. Significant delays in project implementation could affect the overall economics of the project. National funding priorities could temporarily shift in the event of large-scale catastrophic events in other parts of the country. The difficulty in accurately predicting the future makes it impossible to guarantee funding or results. We can, however, provide assurance of our intent to implement the full range of actions identified in the FEIS, and that the tools to do so are reasonably available at this time.

A Watershed Restoration Alternative must be considered, in order to comply with various standards, themes and objectives, including direction included in the South Fork Clearwater Landscape Assessment.

Fire Regime and Fuels Reduction

One of the foundations of this project is to reduce the risk of fire to the private property and resources in the Elk City area. This is addressed through the Purpose and Need of “Reduce the risk of high severity fires in areas important for public safety or cultural or environmental values.” The NPNF Forest Plan provides for cost-effective programs to carry out fuels reduction and fire suppression programs. It is unclear how the Red Pines Project meets this direction. Clarification and demarcation should be provided that identifies which structures and investments are specifically at risk from fire, the relative cost of the project, and how the project will protect those properties and other resources both on and off the national forest.

The Forest needs to justify why fuel reduction is necessary this far away from structures at risk, especially given the high cost of the project, the low value of the timber, the lack of deviation from natural fire regimes and the relative inefficiency of carrying out the project so far away from resources at risk.

Further, the effect of drought and climate change is not adequately considered as one of the root causes for the issues of concern in the project area. This should be amended in subsequent NEPA documentation. The vast majority of the project area falls into mixed and lethal fire regimes (DEIS III-113). Further, large fires in the early 20th Century burned a significant portion of the project area.

The claim that fuels have increased to unnatural levels is not supported in the DEIS.

Response 14-49. Restoration only alternative.

A restoration only alternative was considered but not analyzed in detail because it would not be responsive to the Purpose and Need of this project (FEIS Chapter II, Section 2.3.1). The South Fork Clearwater Landscape Assessment (SFLA) contained recommendations, but it does not constitute direction for the Red Pines Project. Therefore, compliance with the SFLA is not required.

Response 14-50. Fire, fuels. Purpose and need, Forest plan direction.

Resource values, as stated in the Forest Plan include not only Wildland Urban Interface, but timber, air quality, terrestrial and aquatic habitat, recreational opportunities transportation infrastructure, etc. The proposed treatments would modify fire behavior by lowering fire intensities for fires occurring in the treatment areas. This would give suppression resources the opportunity to utilize the treatment areas during suppression activities, which would allow for the control of a fire at a smaller size and/or less cost.

Response 14-51. fire, fuels, structure protection.

With respect to the WUI areas, any treatment done will result in the reduction of the crown bulk density of the stand, including thinning from below and removing ladder fuels, crown bulk density is defined as “the mass of available fuel per unit crown volume.” While these types of treatments (thinning from below and removing ladder fuels) area effective as a measure to keep fires from transitioning from a surface fire to a crown fire, they are not as effective in transitioning a crown fire back down to a surface fire. That transition of a crown to a surface fire is one of the things that larger blocks that have been harvested will accomplish. This will help to better protect the private property and road infrastructure within the WUI. Additionally these treatment areas will provide safe areas for firefighters to initiate suppression tactics within the WUI areas.

Response 14-52. climate, drought.

See responses 13-30, 13-31, 13-35, 13-35b for information relating to climate changes and this project area. See also FEIS, Chapter III, Section 3.5.7.

Response 14-53. fuel levels.

As stated in the hazard discussion of the Fire/Fuels section of the FEIS, it is acknowledged that the short-term risk of a high severity wildfire is possible between the time of the vegetation treatment and the slash disposal is completed. The long term benefits of the treatments, modified fire behavior and lower future fuel loadings, outweigh the short-term risk. Additionally after the slash disposal is completed, the fuel loadings within the treatment units will be less than 12 tons per acre. If the treatments are not completed and stands continue to transition to Fuel Model 10 and 13 we would see fuel loadings in excess of 12 tons per acre.

It is critical that the Nez Perce National Forest (NPNF) learns from past examples of regeneration harvests on the NPNF and other forests that are dominated by Lodgepole pine stands. Evidence shows that under extreme conditions, young stands of dense Lodgepole pine will burn. An example of this is visible on the Caribou-Targhee National Forest, directly adjacent to Yellowstone National Park. The Clover-Mist Fire (1988) was started by woodcutters in a clearcut stand, which had regrown with thick Lodgepole pines. Even though aggressive and responsive fire suppression actions were undertaken, the fire quickly spread through adjacent stands and burned into Yellowstone Park, eventually threatening Old Faithful. Similar examples of clearcutting Lodgepole pine stands should be sought out by the NPNF, and research conducted to determine the effectiveness of logging activities on fire behavior.

It is also important to recognize that not all Lodgepole pine stands were characterized by stand replacement fire regimes. Fire history should be analyzed in the Red River watershed and utilized to determine appropriate treatments. This information should be clearly conveyed in subsequent NEPA documents.

The DEIS states that the effects from a wildfire in the absence of fuel treatments may be less than with fuel treatments. This undercuts one of the primary arguments for the project. This is especially pertinent with respect to attainment of PACFISH Riparian Management Objectives (RMOs). If the effects of a wildfire in the absence of fuel treatments, especially in RHCAs, may be less severe than the effects of the fuel treatments themselves, the project stands in violation of PACFISH and the Forest Plan. In subsequent NEPA documents, the NPNF must adequately demonstrate that RMOs are being met in the project area, and that the proposed activities will not retard attainment of RMOs. Further, analysis should demonstrate that in the absence of the proposed activities, that RMOs would be retarded, and that the proposed activities would improve attainment of RMOs. The DEIS fails to demonstrate that RMOs are being met, that current and future wood debris needs are met, or that cutting in RHCAs would not prevent attainment of RMOs. Demonstration of these, and other, factors could allow for salvage logging or fuels reduction in RHCAs, yet their absence from the DEIS indicates that implementation of the project would result in the non-attainment of RMOs. The DEIS goes on to say, “we anticipate that PACFISH RMOs would not be significantly affected...” This implies that there would be effects to RMOs, yet the DEIS determined that they wouldn’t be significant. Please disclose the full level of analysis and determination regarding this issue in subsequent NEPA documents. It seems apparent from the above issues, that the project stands to violate PACFISH and Forest Plan Standards.

Response 14-54. silviculture, regeneration, lodgepole stands.

It is acknowledged that there is a short timeframe, when canopies grow together in overstocked stands, where lodgepole pine stands that are regenerating may have increased fire behavior characteristics until the canopies start to lift off the ground. As the commenter states, this occurs under extreme conditions i.e. low fuel moistures, high temperatures, and high wind conditions. It was also acknowledged in the Fire/Fuels discussion in Chapter III-121 of the DEIS that under extreme fire conditions fire behavior is rarely responsive to either fuel treatments or suppression actions. What this project is attempting to do is modify the fire behavior in the conditions that would have historically produced large fires but are not the worst case conditions.

Response 14-55. Silviculture. lodgepole stands, fire, regimes.

We recognize that not all lodgepole pine stands are characterized by stand replacement fire regimes, but lodgepole stands located within the project area can generally all be characterized by mixed and lethal fire regimes (see DEIS Chapter III – 110, Fire Regimes) . This can be concluded because the lodgepole stands within the project area are predominately single storied, even aged stands that would follow a stand replacing fire event.

Response 14-56. fire, fish, RHCA., RMO being met.

See Response 14-43. See also additional information that was added to the FEIS, Chapter III, Fisheries Section 3.6.

Response 14-57 PACFISH. Forest plan. Amendment.

See Response 14-56. Forest Plan Amendment #20 incorporates all of the standards and guidelines of PACFISH. As a result, this project is in conformance with PACFISH. INFISH does not apply to the Nez Perce NF, as it relates to areas supporting bull trout without anadromous fish. The FEIS Appendix H highlights and recognizes that activities will be managed to conform to PACFISH.

The notion that clearcuts and other regeneration silvicultural prescriptions mimic fire is not necessarily accurate. Historically, crown fires in Lodgepole pine retained many standing snags, providing structure and habitat for birds and other snag-dependent species. In many cases, burns carried through the crowns of the trees and resulted in relatively minor impacts to soil. Much of the smaller materials (leaves, branches, twigs, etc) remained on the trees and as the snags aged, these materials dropped to the ground where they provided the building blocks for soil. These materials also protect the soil from the impact of raindrops.

Subsequent NEPA documents need to further analyze the effects of removing potassium-containing vegetation on nutrient cycling in the area.

In addition, research from the Hayman Fire (2002) has determined that pine needles, if not burned by the fire, can provide significant protection to the soil surface when they fall to the ground (Interim and Final Hayman Fire Case Study Analyses, 2002 & 2003). By applying regeneration harvests, the beneficial impact of this material is not realized. Instead, slash is deposited on the ground and burned in piles, thereby vastly increasing the potential for soil erosion and subsequent sedimentation of critical spawning habitat for ESA listed species.

Post-logging slash disposal is critical and a number of factors should be considered in the project design and implementation. Machine and jackpot burn piles should be restricted, and if deemed necessary, should be evenly distributed throughout logging units. Large piles create excessive heat, create potassium and nitrogen overloading in small areas, and can negatively impact soil resources. Smaller piles, evenly distributed, or broadcast burning is preferred. However, the burning of these materials still can contribute to significant erosion problems on the forest.

Response 14-58. soils, nutrient cycling, silviculture.

Analysis of potassium and nitrogen removal is in FEIS Chapter 3, Section 3.4. The design criteria and mitigation in Table II-2 specify bole-only yarding of live trees to reduce potassium loss, and additional actions to over-winter slash before burning to allow for nutrient leaching, to minimize excessive slash piling and redistribution of nutrients, and to constrain slash burn intensity to reduce the amount of potassium and nitrogen volatilized. More literature has been reviewed pertinent to this issue and the design criteria and mitigation measures have as been strengthened accordingly. We have considered the findings of Garrison and Moore, 1998; Ouro et al., 2001; Moore et al., 2004; and Palviainen et al., 2004.

Response 14-59. post logging slash disposal, fuels, silviculture, soils.

Post harvest slash disposal, broadcast and jackpot burning, is typically accomplished during times of the year when duff moistures are high enough to prevent the total consumption of the duff. The duff that remains provides soil protection against runoff, and continues to provide nutrient cycling to the soil. Machine piles located within the unit are typically smaller in size and distributed fairly evenly throughout the units.

Broadcast burning and underburning would occur on about 66 percent of the acres in Alternative B and 56 percent in Alternative E, with C and D intermediate. This burning is done when duff moistures are high enough to prevent total consumption of the duff. The duff that remains provides soil protection against runoff, and sustains soil nutrients. Grapple piling would occur on 34 to 44 percent of the treated depending on alternative. Piles will be smaller in size and distributed more evenly throughout the unit than historically. Design criteria in Table II-2 specify that grapple piling will be minimized, and that piles will be small and numerous rather than few and large. This will reduce the over-concentration of slash and reduce potential for hot burns that volatilize nutrients and damage soil structure and microbiology. Because of these mitigation measures and because inherent surface erosion hazards are low in most of the project area, erosion risk from fuels treatments should be minimized.

Finally, in terms of hazardous fuels reduction and structural protection, this project, as designed, is both inefficient and ineffective. Much of the surrounding area has been heavily logged and, in the interest of community protection, “connecting the clearcuts” could be more effective than laying out units on the basis of pine beetle mortality, and/or economic factors.

In order to be more efficient and effective, the NPNF should apply landscape scale fire modeling, i.e. using FARSITE, to determine what the effects of the proposed treatments would be. Such an analysis could also help to determine more effective location for logging and silvicultural prescriptions in the interest of reducing rates of fire spread, intensity and severity.

Overall, we encourage you to be more strategic in your planning and project design with regard to reducing fire risks. This project seems to be more of the same that has already occurred in the South Fork Clearwater Watershed and would not reduce the fire risk. In order to ensure that tax dollars are wisely spent, and that the Forest Plan is adhered to, projects should be more strategic in terms of designing them to address fire risk, while concurrently providing revenue to the U.S. Treasury and providing resource-based jobs to the local communities.

Fisheries

Snake River Steelhead Trout, Columbia River Bull Trout, Snake River Spring/Summer Chinook Salmon, Interior Redband Trout, and Westslope Cutthroat Trout, and Pacific Lamprey all occupy the project area. Consultations with both the NOAA Fisheries and the U.S. Fish and Wildlife Service should be conducted, resulting in Biological Opinions from each consulting agency.

As previously mentioned in these comments, we are concerned watershed improvement projects are merely attempts to mitigate for increased logging and are ineffective in actually improving conditions over current conditions. The proposed salvage harvest and road construction, reconstruction, and maintenance design criteria and best management practices need to be designed and implemented to significantly improve existing aquatic conditions. Unfortunately, each of the action alternatives, as currently envisioned, fail to meet this test. This is clearly stated at several locations in the DEIS, i.e. “the Red Pines project is not expected to result in an upward trend in aquatic condition;” (Appendix H-25) and “It could be argued that Alternatives B, C, and D reduce habitat quality over the short term since sediment and habitat modeling suggest further degradation of the sediment indicators.” The DEIS relies on speculation that conditions will improve, but fails to provide adequate evidence upon which to base any firm determinations.

Response 14-60. fuels reduction.

The project would create breaks in the continuity of fuel arrangement within the project area. These breaks would help to achieve two purposes; the first would be to modify the fire behavior to produce a less intense fire. Also by lowering the fire intensity these breaks will slow and modify the fire spread (Finney 2001) and give suppression resources a safe area to initiate suppression responses. The proposed treatment units would tie in with the past harvesting within the area to create the spatial patterns referred to by Finney for landscape treatment to modify the fire behavior.

Response 14-60a. fire modeling. The Nez Perce NF does not currently have good enough data for this type of modeling to be effective over the whole forest.

Response 14-61. fire, risk, amck 1-16a.

Comment acknowledged. We believe this project strategically addresses fire risk while concurrently providing local employment opportunities.

Response 14-62. fish, consultation.

NOAA Fisheries and the U.S. Fish and Wildlife Service were provided copies of the DEIS and were asked to provide comments. In addition, both agencies fulfilled their consultation responsibilities under the Endangered Species Act. Biological Opinions from both Agencies will be appended to the ROD when issued for this EIS.

Response 14-63. fish, restoration, mitigation, upward trend.

Please see response 13-11. We developed Alternative E to address these issues.

As a result, the projects design and analysis falls short of the criteria established in various documents, including PACFISH, INFISH, the Forest Plan, South Fork Clearwater River Subbasin Assessment and TMDL, South Fork Clearwater River Landscape Assessment, Red River Ecosystem Assessment at the Watershed Scale, South Fork Clearwater River Biological Assessment, and others.

Existing aquatic conditions are in violation of Forest Plan standards for sediment and temperature and must be significantly improved in order to comply with the Forest Plan and the TMDL.

Old Growth, Inventoried Roadless, and Unroaded Areas

We question the assertion that the Red River watershed meets the Forest Plan standard for Old Growth (DEIS, III-218). We strongly encourage you to conduct field reviews, in order to determine whether or not any of the proposed logging units currently meet Old Growth Criteria, as described in Old-Growth Types of the Northern Region (Green et al, 1992), or as established in the existing Forest Plan.

Any stands slated for logging which meet either of these criteria should be eliminated from the proposal. The vague statement that, “Proposed activities were designed to avoid identified old growth and replacement old growth habitats,” does not lead us to believe that old growth forests will be reserved from logging. Instead, this statement leads one to believe that as long as areas are not inventoried and classified as old growth, that they could be logged.

Response 14-64. Pacfish, infish. INFISH does not apply to streams on the Nez Perce National Forest. Please see Response 14-43, 14-42, 13-23, and 4-7.

Response 14-65. forest plan. See FEIS Sections relating to Forest Plan Compliance.

Response 14-66. SFCWR, TMDL– Please see responses 14-31 through 14-33.

Response 14-67. SFLA and EAWS. – Please see response 14-49.

Response. 14-68. BO.

Response 14-69 Forest plan standards, TMDL. The USFS recognizes the below-objective conditions of these watersheds. The aquatic trend analysis is documented in the FEIS, Appendix H and an upward trend in aquatic condition is expected to be achieved with the newly developed Alternative E.

Response 14-70. wildlife, old growth.

Additional old growth field reviews were conducted between the DEIS and the FEIS. Old growth field reviews were conducted in 2002, 2003 and 2004 in the Red Pines analysis area. Old growth plot data from the 2002, 2003, and 2004 field reviews are available in the project file. We compared existing data in proposed old growth units to the Green et al (1992) and Forest Plan Appendix N old growth criteria. A table is available in the project file.

Field notes from site visits to proposed harvest units are in the project file. We compared existing data in proposed harvest areas to the Green et al (1992) and Forest Plan Appendix N old growth criteria. A table is available in the project file.

In the FEIS, Forestwide inventory and analysis (FIA) data were used to describe existing conditions for the following species and habitats: old growth, snags, pileated woodpecker, pine marten, goshawk, and fisher. Criteria used for FIA data queries are in the project file. Forestwide Inventory and Analysis forest inventory is the Forest Service (FS) national approach to inventory and monitoring of forest vegetation resources (<http://fsweb.ogden.rmrs.fs.fed.us/>) and provides a consistent data set across Forest Service Region One. The plot data—specifically the four major old growth traits identified by Green et al. (1992) – can be used to estimate the amount of old growth and distribution by species group and habitat type group. This level of inventory is not spatially explicit, but from the single intensity FIA grid plots, quantities of old growth can be estimated with statistical confidence for Sub-Regions, Forests, 4th Code HUC, and areas that approximate the size of a large, or group of 5th code watersheds (i.e. Red River watershed) (Bollenbacher et al. 2003). Forest inventory and analysis data at three scales (Forest-wide, South Fork Clearwater River Sub-Basin 4th code HUC, and Red River Watershed 5th code HUC) have been incorporated into the text of the wildlife analysis in the FEIS.

Response 14-71. wildlife, old growth

Old growth/replacement old growth was used as a screen in treatment area identification. We conducted a process of data queries to identify overlap between old growth and treatment stands. The results of the queries showed areas less than 5 acres in size were overlapping, with most of them being under 1 acre (what we call GIS slivers resulting from very minor GIS mapping inconsistencies when layering data/maps). Refer to Response to Comment 14-70 for more information. No Forest Plan old growth would be harvested under any alternative.

Protection of Old Growth in areas with deficiencies is critical in terms of meeting the requirements to maintain population viability of Management Indicator Species. The DEIS concludes that the Red Pines project area is meeting the 10% Forest Plan requirement, yet fails to provide adequate documentation for this claim. Subsequent NEPA documents should discuss which criteria were adhered to (Forest Plan or Northern Region).

Additionally, status of replacement old growth should be discussed. The Forest Plan describes replacement old growth as “a timber stand that will meet old-growth criteria within 100 years,” (Forest Plan, App. N-1). Age classes, forest types, successional stage and other information should be included in subsequent analyses which gives an indication of the status of these stands.

Numerous problems have been found with old growth inventories on the adjacent Clearwater National Forest, and to avoid any similar occurrences, the NPNF should immediately initiate a forest wide analysis of old growth as part of this and other projects being considered in the area. Simply assessing the Old Growth conditions in the Red Pines Project area is insufficient to meet the population viability standards of NFMA for Management Indicator Species. Instead, the NPNF should assess Old Growth conditions throughout the forest to ensure that the 10% minimum Old Growth is being met.

Response 14-72. wildlife, old growth, forest plan standards.

Under both criteria noted, Forest Plan 10% minimum would be met under all action alternatives. A list of old growth and replacement old growth stands is located in the project file. Refer to the Old Growth section of the FEIS for more information.

Response 14-73. wildlife, old growth, replacement, stand information.

Response 14-72 and 14-73

The project file includes a list of all proposed old growth and replacement old growth stands along with available age, forest type, successional stage, tree density, and size class information. The project file includes a list of all treatment stands along with available age, forest type, successional stage, tree density, and size class information.

Response 14-74 and 14-75. wildlife, old growth, inventories, forest plan standards

See response to Comment 14-70 specifically discussing FIA data. Additionally, Regional assessments for black-backed woodpecker, pileated woodpecker, pine marten, flammulated owl, goshawk, wolverine, and fisher were included in the project file document titled Terrestrial Population Viability Analysis.

See also Response. 14-73. and Response 14-72.

With the current uncertainty surrounding the status of roadless area management, we encourage you to avoid logging in any Unroaded areas. The DEIS failed to analyze the impacts of the project on Unroaded areas. According to a map entitled, "Upper South Fork Projects: Forest Service and Bureau of Land Management," dated March 1, 2004, numerous units are targeted for logging in Unroaded areas. Maps, which delineate Unroaded Areas, should be included in subsequent NEPA documents. Further, we strongly encourage you to examine the impacts to these areas in subsequent NEPA documents.

These areas provide many benefits to wildlife and forest health through their diversity of plant life, habitat security, and inaccessibility. Regardless of whether they were inventoried by the Forest Service during the Roadless Area Review Evaluations, they have value and should not be logged or roaded as part of this project.

Soil Quality

The Red Pines project should not rely on a Forest Plan amendment to exacerbate existing and future soil disturbance. Instead, the Forest Service should redesign the project to ensure that existing soil standards are adhered to for planned logging and road construction. Additionally, restoration activities should be undertaken to ensure that past logging and road construction is brought into compliance with existing Forest Plan and Regional Soil Quality Standards.

Response 14-76. roadless.

No treatment is proposed in Inventoried Roadless Areas. Previous inventories were conducted to determine if areas have suitability for future Congressional designation as Wilderness. These areas are identified as Inventoried Roadless Areas. There are protocols that are used to determine whether or not the area is suitable. The West Meadow Creek Inventoried Roadless Area (#1845C) and the Dixie Summit-Nut Hill Inventoried Roadless Area (#1235) were identified as not suitable for Wilderness based on the inventory criteria. Please see the Wilderness, Inventoried Roadless Areas, and area with nroaded characteristics Section 3.17 in Chapter III of this FEIS for effects to roadless areas.

Response 14-77. soils, forest plan amendments.

See the response to 3-25.

The National Forest Management Act (NFMA) and the Multiple Use Sustained Yield Act (MUSY) require the Forest Service to ensure the productivity of the landscape in perpetuity, which includes the soil resource. The DEIS admits that Forest Plan and Regional Soil Quality guidelines have been exceeded. This is an admission of NFMA violation, and specific activities which led to these violations must be documented (i.e. date, project, type of activity, etc.).

While our organizations appreciate efforts to improve and restore soil resources, the proposed Forest Plan amendment falls short of ensuring restoration. Instead, the proposed amendment will likely result in negligible improvements in areas that exceed the current Forest Plan Soil Standard (DEIS III-26). If a Forest Plan amendment is considered, it should enforce and strengthen the existing Standard, and should bring areas that are not meeting Forest Plan guidance into full compliance.

In terms of effects to soil resources, the proposed action ranks the worst. With 6,302 acres of regeneration logging (shelterwood and clearcut), the DEIS notes that soil biological and chemical properties would be most affected (III-15).

Even with an amendment, which allows, for continued violation of the Forest Plan Soil Standard, long term impacts to soil properties (including potassium and nitrogen) may be unacceptable under the National Forest Management Act and the existing Forest Plan. The loss of soil as a result of planned activities will reduce the productivity of lands in the project area. This is inferred from the DEIS (III-28), where it says, “The effects of soil displacement and surface soil erosion are least reversible, and most irretrievable, since the volcanic ash surface material is hard to replace.” The DEIS goes on to say that the Proposed Action would result in the most significant impacts. Please clarify in subsequent NEPA documents how the project will reconcile these concerns, and meet the intent of NFMA.

Response 14-78. soils, regional and forest plan standards. **Response 14-79.** soils, forest plan amendment.

See also Response to 3-25. The Regional Soil Quality Guidelines and Forest Plan soil quality standards are the primary vehicles for ensuring compliance with the National Forest Management Act provision for maintenance of soil productivity (USC § 1604 (3)(g)(E)). The proposed amendment adopting the Regional Guidelines will tighten the threshold for detrimental disturbance from 20 to 15 percent of an activity area. This means that detrimental effects must be less on units that have no prior impacts, and that additional restoration will be done to assure that compliance is achieved on each activity area, or an improved condition on units with prior impacts in excess of 15 percent.

The amendment will allow entry into areas with prior impacts that exceed 15 percent, only if an improved condition is shown at the end of activities. Monitoring specified in Appendix I requires actions to ensure that standards are met either through modifying activities or supplemental restoration wherever needed. Strong design and mitigation measures in Tables II-2 and II-3 will also help ensure that standards are met.

Response 14-80. soils, acknowledge comment.

Since the DEIS, design criteria and mitigation to protect soil biological and chemical properties have been strengthened. All green tops and limbs would be left on site (Table II-2, item 15). Requirements for soil wood including both existing soil wood, snags and green trees, follow all regional protocols and research recommendations (Table II-2, items 14 and 34). The design criteria and mitigation measures for grapple piling (Table II-3, item D) has been clarified to provide direction that slash piling be minimized commensurate with fuel reduction objectives, and that slash not be heavily redistributed and over-concentrated. This will help reduce local losses of nutrients and soil damage from severe slash burns. Monitoring (Appendix I) will help identify during implementation, whether activities need to be modified. After completion, monitoring will sample and report how well retention of down wood, leave trees, green tops and limbs, and snags was achieved.

Response 14-81. soils, soil standards.

Please see the response to 14-78, 14-79.

Further, please demonstrate, in subsequent NEPA documents, how the application of ground based equipment across a significant portion of the project area, in concert with high-severity slash treatments will ensure the long-term sustainability of soil resources in the project area.

Response 14-81a. soils, soil standards.

This is taken to mean: How do we ensure long-term sustainability of soil resources in a project that employs extensive ground-based logging and slash treatments? The linkage is through implementing the soil quality standards, as amended to incorporate the Regional Soil Quality Guidelines. This linkage is described in responses to comments 14-78 and 14-79. These standards represent the estimated limit of delectability of response to soil damage, among researchers at the time of development of the standards. The Regional Guidelines would not only supplant the Forest Plan 20 percent detrimental disturbance with a 15 percent threshold, but also add additional definitions of soil damage that include severe burning or loss of organic matter, which were not described as detrimental disturbance in the Forest Plan standards. Compliance with the amended standards means that soil productivity would be better protected on activity areas with no prior entry. Of the 3454 to 6466 total acres proposed for harvest (depending on alternative), about 90 percent have no record or evidence of prior entry. On these acres the amended standard would better protect soil productivity than the existing Forest Plan standard. Thirty two units were reviewed that had some documentation of harvest, photo interpreted evidence of harvest, or were near inholdings where historic harvest may have been likely. Seven of these showed detrimental soil disturbance in excess of 15 percent. All of these had excavated or compacted skid trails or landings that could be restored to improve soil productivity.

Ground based logging is proposed on about 36-45 percent of the acres, depending on alternative. Logging systems are chosen based on a combination of cost, terrain, and silvicultural prescription. Effects of ground-based logging, including compaction, displacement and erosion, are analyzed in the FEIS Chapter 3.4.6. Extensive design criteria and mitigation measures are required for this project to limit detrimental soil physical disturbance from ground-based logging (see Table II-2 and III-3). Monitoring is also required (Appendix I) that will help identify during implementation, whether activities need to be modified, or additional restoration work done to assure that soil productivity is maintained within soil quality standards as amended.

Compliance with the Nez Perce National Forest Plan

One of the tenets of the existing Forest Plan is to "restore natural disturbance processes where feasible." Considering this, the mountain pine beetle infestations and wildfires should be allowed to a certain extent to meet the Forest Plan. This is particularly relevant due to the fact that it is acknowledged that lethal fires would be normal for these fire regimes in the area.

Since this project is not in the WUI, and other projects are currently addressing the risk to structures and natural resources, the project should be significantly scaled back.

Choosing the proposal with the least risk of sedimentation would be needed to meet Goal 4 of the Forest Plan.

Given that Bull Trout, Steelhead Trout and Chinook Salmon exist in the Rivers, and the risk of sedimentation is high in the short-term under the proposed action, the Proposed Action clearly does not meet the goal and intent of the Forest Plan in this regard.

The Proposed Action would also violate fish/water quality objectives under the Forest Plan. The Forest Plan recognized that many of the watersheds in the Red Pines Project Area do not meet fish/water quality objectives under current conditions (DEIS, Page III-70). The Forest Plan stipulates that an upward trend in aquatic habitat carrying capacity be established in certain below objective watersheds. This trend can only be accomplished by limiting new disturbance, allowing natural recovery and/or implementing watershed restoration activities. By proposing new roads and timber harvesting that will further degrade the watersheds, the project clearly fails to limit new disturbances or allow natural recovery. Allowing short-term degradation while proposing long-term restoration is contrary to the objectives and intent of the Plan since it clearly states that a limitation of new disturbance is necessary. Offsets are not enough to meet this criterion.

Response 14-82. fire regimes, vegetation..

Refer to Response 14-149. This project is treating approximately 6% of the analysis area. The disturbance process of insect infestation is occurring on many of the untreated acres. The natural fire process is likely to occur on the untreated areas. There are also more than a million acres in wilderness and many thousands of acres in roadless areas that have not been managed and are in a natural state (excluding fire suppression).

Response 14-83. fire, WUI.

The Forest Plan and Fire Management Plan currently do not allow for Wildland Fire Use (WFU) within any portion of the project area. Without the authority for WFU all fire ignitions within the project area require a suppression response and cannot be allowed to play its natural role.

Response 14-84. water quality, sediment, forest plan goals.

Goal 4 calls for providing habitat to contribute to the recovery of threatened and endangered species and to provide habitat to ensure viability of these species. The No Action (Alternative A) while providing for the least sediment, will also not allow for watershed and fish habitat restoration activities. The added sediment for any action alternative is not likely to be of sufficient amounts to show difference or added risk to species viability. Sections 3.5.6.2 and 3.6.7 of the FEIS, display the modeled (NEZSED and FISHSED) differences between alternatives. Refer, also to the Alternatives Comparison Tables in Chapter II.

Response 14-85. fish, forest plan standards, water quality.

It has been determined that the preferred alternative meets the upward trend requirements stated in Appendix A of the Forest Plan. The rationale for this conclusion is found in the FEIS, Appendix H of the FEIS.

In order for the project to comply with the Forest Plan, amendments would have to be included to exempt certain portions of the project from Forest Plan standards. While this is true, we do not advocate for Forest Plan Amendments which lower the standards for sediment, soils, Equivalent Clearcut Areas, fish habitat, water quality, stream productivity, or other issues. Instead we urge you to modify the project in order to comply with the existing Forest Plan.

Off-highway vehicles

The damaging effects of irresponsible OHV use are well documented and could be contributing to water quality problems among others. It is clear that the Proposed Action will not do enough to curtail trail blazing. Previous NEPA documents stated, "Numerous undocumented user-created ATV trails exist, which add to the amount of detrimental disturbance in the project area." This leaves one to wonder if management has fallen behind the reality of the current situation.

Accordingly, restrictions and monitoring should be increased. This is also a reason to minimize road construction to prevent further intrusion into areas.

The analysis of impacts from OHVs needs to be improved in subsequent NEPA documents, and should reveal the current level of monitoring, new restrictions and actions proposed as part of the project.

Inappropriate trails need to be closed. Subsequent NEPA documents should evaluate soil disturbance from motorized trails and should identify opportunities to ensure protection from these activities. This is necessary given that sedimentation is a huge problem in the watersheds.

The DEIS fails to clarify whether any management of non-system roads, trails, or skid trails would occur with the project.

Even for the system roads that are proposed for closure, abandonment, or obliteration, we have yet to see effective closures and enforcement that prevent use by OHVs. The devastating impacts of irresponsible Off Highway Vehicles (OHVs) on forest ecosystems are well established. OHVs accelerate erosion, degrade water quality, spread noxious weeds, fragment wildlife habitat, disturb wildlife, and displace non-motorized forest users.

Response 14-86. water quality, amendments, forest plan standards.
See Responses 1-2 and 3-25.
There is no Forest Plan standard for Equivalent Clearcut Areas.

Response 14-87. recreation, transportation, OHV.

No complete inventory of all terrain vehicle trails, whether system trails or user-created trails, was done for this project. Sediment from trails was not explicitly measured or modeled using NEZSED, but trails on erodible materials were documented in FEIS Chapter 3, Section 3.4.6.3, Surface and Substratum Erosion. Specific sites were identified for restoration.

Response 14-88. transportation, recreation, enforcement, monitoring.
See Responses 14-87, 14-92, 14-107.

Response 14-89. recreation, trails.
Comment acknowledged.

Response 14-90. Recreation, trails,. No changes are being planned to manage illegal road or trail use.

Response 14-91. Roads that are decommissioned are generally not gated or signed. The concept behind this approach is that we do not want to call attention to the fact that a road had previously existed. Please refer to FEIS Section 3.13.6.1 of the FEIS for descriptions of the various decommissioning methods.

If the roadway is recontoured, the original ground contours will be reestablished, as nearly as practical, and the exposed soil will be protected with litter, slash, and seeded if needed to establish vegetative cover. As a result, there will no longer be a horizontal, compacted surface on which to drive, and the vegetation, once established, will act to camouflage the obliterated road.

If a road is substantially grown over with vegetation, is not in close proximity to a stream, and is located on a relatively flat side slope - on a ridgetop, for example - we may choose to simply abandon the road. The fact that the road has substantially revegetated indicates a lack of vehicular traffic in the past, and we would expect that significant problems with unauthorized incursions would not be a problem in the future.

Where we might reasonably expect to experience problems with unauthorized incursions on a decommissioned road we would camouflage the entrances, either by recontouring the roadway at the entrances or by placing natural barriers, such as logs and branches. Patrolling of the entrances to decommissioned roads by law enforcement to prevent unauthorized incursions would be conducted as resources allow.

The Forest Service needs to describe how they will effectively monitor and control the use of OHVs on Forest Service and non-system roads, obliterated roads, and trails in the project area. The analysis should include funding and numbers of personnel available for these duties.

If the Forest Service is unable to demonstrate their capability to manage recreational use of these roads, no new roads, even temporary ones, should be constructed. The analysis should also examine this project will affect snowmobile use in, and adjacent to the project area.

Roads

The DEIS acknowledges that the existing road network has negatively impacted the watershed and that a fire would multiply these effects. Instead of taking a logical approach of reducing the road system, the Forest Service plans on removing the fuels using more roads, relying on unproven science to justify these actions.

Roads contributing significantly to sedimentation should be decommissioned. Subsequent NEPA documents should identify the number of acres that are affected by and contain old roads that are on soil rated high for erosion. Further, analysis should identify areas where new roads are planned in these sensitive soil types, and in landslide prone areas. As many of these roads as possible should be decommissioned. The analysis should also provide information regarding what the risk of erosion is for those roads that are being proposed for decommissioning under the project.

Response 14-92. recreation, OHV, closures.

Monitoring will only be conducted during the implementation process and will be funded as a part of the project implementation.

Physical closures will need to fit into the terrain to be effective (difficult to pass or get around).

Response 14-93. recreation

No changes are being planned to managing illegal road use. No changes in snowmobile use anticipated unless a reroute is needed to mitigate winter hauling on an established groomed trail.

Response 14-94. roads, transportation, decommissioning.

Landslide risk and erosion hazard are two factors considered when evaluating roads for decommissioning. Administrative jurisdiction and public demand for that road are other factors. Roads with live water crossings, active erosion or unstable ground were priorities for decommissioning, within the subset of roads not required for public and administrative use. Additional roads are proposed for decommissioning to improve hydrologic function and soil productivity.

Under alternative E, a total of 89 miles of required road decommissioning would occur (see Appendix H). Of these miles, 81 (323 acres) would constitute soil restoration as well. About 57 miles (229 acres) of the required decommissioning would treat soil substrata with high erosion hazard and the remainder would decommission roads on moderate erosion hazard.

About 12 miles of temporary road construction are proposed (Alternative E) on soil substrata rated high for erosion hazard, and about 6 miles on soils of moderate erosion hazard. Please see the FEIS, Chapter 3.4.6 for this analysis. Displacement and loss through mixing of the surface soil, usually the more permeable and productive volcanic ash layer, is a result of all road construction unless topsoil is stockpiled and replaced. This is also discussed in the FEIS, Chapter 3: Section 3.4.

No temporary road construction is proposed for Alternative E on lands mapped as high landslide hazard, and less than one mile on lands mapped as moderate hazard. These are usually through draws where design features such as culverts, slash filter windrows, and PACFISH buffers help maintain slope stability below the road. Road decommissioning will occur on 1 acre of high landslide hazard and 25 acres of moderate. Road removal and recontouring will promote slope stability on these sites. See the discussion in Chapter 3: Section 3.4.

The DEIS discusses various possible scenarios for decommissioning, including abandonment, gating, and obliteration. It should be made clear what each closure method will be for each road, as simply abandoning a road that is regularly used as an ATV route will continue to result in long-term impacts. Further, the analysis should clarify that temporary roads are difficult to restore to their former productivity, as has been previously established. Therefore, excessive construction of temporary roads will have lasting impacts and will jeopardize resource values for years to come.

No new road construction should occur on soils highly susceptible to erosion or compaction. It is particularly troubling that the Proposed Action includes an estimated 36 miles of temporary road construction. Further analysis should clarify the number of miles and acres of new roads that will be built on soil substrata highly susceptible to erosion, in landslide prone areas, and within RHCAs. It is absurd and unacceptable that the Forest Service would propose adding to the acres of current roads in areas at high risk of erosion when the watersheds are already being heavily impacted and degraded by sedimentation from this erosion.

Response 14-95. road decommissioning, closure device.

Refer to Response 14-91, above, for a discussion of unauthorized incursions on decommissioned roads; also Response 5-8 and Response 13-55 for further details.

All temporary roads constructed as part of this project would be decommissioned within three years of their construction (refer to FEIS, Chapter II, Design measures).

In the FEIS, Each road being utilized for the project is listed in Appendix C. That Table lists the proposed closure method by alternative. Roads where abandonment is proposed are roads where access is not now available or will not be available after the access road has been re-contoured. Refer also to Appendix H for the decommissioning levels recommended for each of the roads proposed for decommissioning by subwatershed.

We acknowledge that, at present, the soil productivity at locations where roads were constructed and subsequently decommissioning is difficult to reestablish. The alternative to building temporary roads is to limit the prescribed treatment activities to areas that can be accessed solely from existing roads.

Response 14-96. New roads.

See Response 14-94.

The range of alternatives proposes from 18 to 36 miles of temporary road construction; 12 to 25 miles (46 to 99 acres) of this road construction would be on soils of high substratum erosion hazard, and less than 1 mile (0 to 1 acre) of road construction on lands mapped as high landslide hazard. See FEIS, Chapter 3, Section 3.4.

Less than 1 mile of streamside temporary road would be constructed. Temporary roads were designed for minimal stream crossings and minimum length. One stream crossing appears on the maps for Alternatives B and C. It is a tributary of Ditch Creek and would require a structure for fish passage. It is recommended that the structure be removed at the end of activities when the road is decommissioned. Existing roads 1183 and 1172F would require improvements to crossings for fish or flow passage. Also required for all alternatives are the removal of 19 culverts or log bridges and addition of 20 stream crossing improvements for fish or flow passage. Additional discretionary watershed improvements include 13 more stream crossing improvements and 2 culvert or log bridge removals. As part of required road decommissioning, approximately 97 road stream crossings would be removed and the stream banks restored, for Alternative E.

We continue to adamantly oppose any new road construction in the project area, even temporary construction. The proposal for 36 miles of temporary roads, several new stream crossings and 92 miles of reconstruction is absurd given the current conditions of the watershed from previous roading and management activities.

Previous management activities have resulted in excessive road densities throughout our National Forests, including the Nez Perce National Forest, and specifically the Red River watershed. This density compromises the project area's ability to support wildlife and fish by promoting further human disturbance, fragmenting habitat, accelerating sedimentation, and encouraging ORV use.

The United States Fish and Wildlife Service Bull Trout Interim Conservation Guidance states that depressed bull trout populations had an average watershed road density of 1.4 miles per square mile and were extirpated with road densities above 1.7 miles per square miles (*page 27, BTICG*). The DEIS failed to exhibit the road density by project alternative. Subsequent NEPA documents must show the current and proposed road densities during project implementation for all the alternatives, including within 150-ft RHCAs on perennial, non-fish bearing streams and 100-ft. RHCAs on intermittent streams.

Response 14-97. roads, new construction, temporary roads.

Please refer to the response to comment 14-95 for a discussion of the need for temporary roads and then subsequent decommissioning of these roads. The areas available for prescribed treatment activities that are accessible from existing roads are insufficient in size or location to satisfy the project's fuel reduction objectives.

Of the proposed eight stream crossings, in the new Alternative E, only one crossing has live water associated with it and an existing culvert is already in place. Please refer to the FEIS, Chapter III, Section 2.3.4, Tables II-2 and II-3 for the description of Project Design and Mitigation Measures for the Red Pines Project. For additional information regarding live water stream crossings and road decommissioning see the FEIS, Chapter III, in Section 3.6.7.2.

The amount of temporary road miles varies from 18 miles to 36 miles, depending on the alternative. The new Alternative E would construct the least amount. This reduction was done largely in response to aquatic concerns expressed relative to the alternatives in the DEIS.

The road reconditioning varies from 79 miles to 92 miles, depending on the alternative. This work entails a range of treatments, from road maintenance to moderate levels of reconstruction. The moderate reconstruction is prescribed for 78 miles to 92 miles, depending on alternative. Some of this work is specifically designed to improve watershed condition, some is for timber haul, and some have multiple objectives.

Response 14-98. roads, road densities

The effects of past management activities, as well as road densities, are described in the FEIS, Chapter III, Section 3.5.6.3. Restoration activities associated with this project include reducing the amount of roads within the project area, which are also discussed in this Section.

The FEIS, Chapter III, Section 3.5.6.3 displays the number of stream crossings that would be improved to provide fish access to both perennial and intermittent streams.

The roads actions in the Red Pines Project decommissions significant miles of existing roads and should be recognized for the measure of positive habitat restoration generated for numerous species. The temporary roads being built for the project will all be decommissioned and thus do not add to the road density (refer to FEIS, Chapter II, Table II-5). Past road density impacts and related cumulative effects analysis discussions for affected terrestrial wildlife are in the FEIS, Chapter III, Section 3.12.

Response 14-99. roads, fisheries, road densities.

Subwatershed road densities and sediment yields above baseline are disclosed by alternative in the DEIS Tables 3.7, 3.10, 3.14 and 3.17. Existing riparian road densities are shown in Tables 3.6 and 3.13. These figures are not expected to change much by alternative since all temporary roads are being decommissioned and few of the existing roads planned for decommissioning are located in riparian areas.

The Interim Conservation Guidance states that the document is not intended to provide site-specific land management prescriptions, but is intended to provide recommendations that may be adapted to land management activities (USFWS, December 1998). This same report recognizes that reducing road miles, improving fish passage, decreasing water temperatures, and improving substrate and habitat complexity are all important in recovering bull trout populations. This FEIS contains actions designed to meet these needs (FEIS, Chapter III, Section 3.6).

Furthermore, there is a positive correlation between roads, even temporary ones, and human-caused wildfire ignitions and decreases in Elk Habitat Effectiveness (EHE). Statistics and findings related to human-caused fires and EHE need to be addressed and analyzed.

Subsequent NEPA analysis should reveal additional information with regards to temporary roads, including number of stream crossings, construction within RHCAs, landslide prone areas, and on soils susceptible to erosion.

It is impossible to decipher from the DEIS, how many new permanent roads are proposed for construction, or how many stream crossings are proposed with either temporary or permanent roads.

Response 14-100. roads, Wildlife, EHE, human caused fires.

Open and seasonally open road and trail densities are factored as inputs to the North Idaho Summer Elk Model, which generated habitat suitability effectiveness outputs (related in Section 3.12.6, Chapter III of the FEIS. Although the presence of and frequent public travel on open roadways may increase human-caused fire risks, and similar open roads and trails may result in impacts to elk habitat effectiveness independently, we can think of no logical, resource effects rationale to correlate the statistics and findings between these two otherwise unrelated parameters. Under all action alternatives, road decommissioning would reduce cumulative effects of road construction on wildlife species in Red River watershed. Using temporary roads in all action alternatives would prevent new long-term impacts to wildlife species using Red River habitats.

As references in the DEIS, Chapter II, page III-115, there have been 31 human-caused fires of the 233 fire ignitions (13%) in the project area occurring from 1970 to 2003.

Response 14-101. roads, temp roads, stream crossings, landslide prone, soil erosion., roads within RHCA

Please see the response to 14-94, 14-95, 14-96 above, for a more detailed discussion regarding the reasons for proposing the use of temporary roads. Please refer to comment 14-97 for a discussion regarding stream crossings. Refer to comment 14-94 for a discussion relating to roads and, landslide prone areas and soils susceptible to erosion.

See Table III-29, in Section 3.5.6.3, Chapter III of the FEIS for the existing amount of roads within RHCAs and Table III-30 for proposed treatments within RHCAs, including stream crossings.

Response 14-102. roads, new permanent roads, crossing (temp & Perm)

There are 0 miles of new permanent roads proposed with the Red Pines Project. Please refer to the Table II-2, page II-9 in the DEIS for the number of miles temporary road construction. Please refer to comment 14-97, and 4-101 for a discussion regarding stream crossings.

At page II-257, the DEIS states, “Road #1183 is proposed to cross Ditch Creek.” The DEIS goes on to say, “Alternatives B, C and D propose a permanent road to cross Soda Creek.” As roads have been identified as one of the most critical components of this project, subsequent NEPA analyses must truthfully represent the proposed activities. No information which adequately details new permanent roads, or stream crossings is included in the DEIS. This must be corrected. While we commend your efforts to decommission up to 96 miles of existing roads.

We believe that a much greater number of road need to be decommissioned. Decommissioning a greater number of roads would reconnect previously fragmented stands, increase the amount and quality of wildlife habitat, reduce soil erosion, reduce sedimentation, and improve water quality, thereby enhancing the forest as an ecosystem and an asset.

It is essential that road-decommissioning proposals be guaranteed as part of this, or any project. We recommend that funds be secured to pay for the decommissioning, regardless of the revenue generated by the sale of timber. The NPNF should investigate the potential to acquire appropriated funds for the purpose of road decommissioning. If timber sales are delayed or fail to attract bidders, roads should still be decommissioned as part of this project, and should not be contingent upon the sale of timber. Utilizing congressionally appropriated, cost-share, mitigation and/or restoration funds for road decommissioning should be prioritized for the Red River Watershed.

Response 14-103. Transportation, roads, Road #1183, permanent roads.

Please refer to response 14-102 for details about proposed roads for the Red Pine Project.

Response 14-104. decommissioning more.

Please refer to response 14-21 for a discussion regarding watershed restoration improvements, including decommissioning of existing roads. See also response 14-105.

Response 14-105 transportation, roads, decommissioning – guaranteed

Please see response 14-21 and 14-48 regarding road decommissioning and securing of funding for the proposed project.

The scoping document states that temporary roads would “normally” be decommissioned within one to three years of construction. Please cite examples from the NPNF where roads were decommissioned within pledged timeframes, as well as examples where the timeframe was extended. Please provide reasons for why these roads were not decommissioned in a timely manner.

Subsequent NEPA analysis needs to give past examples of the range of years that temporary roads have been in place on the NPNF, or other forests in the region. This will give a clearer picture of how long roads might be in place. Given the increased flexibility in timber contracts, we fear that these roads might be in place for several years and some ‘atypical’ high-risk roads may be present in degraded watersheds for up to a decade or more.

Given the extremely poor success rate the Forest Service has regarding enforcing road closures, it is likely that continued user-created resource damage will continue to occur into the foreseeable future. The most practical way to realize an upward trend in fish habitat is to reject any temporary roads and to preclude this type of treatment, especially within all drainages not meeting beneficial uses.

The project should decommission and obliterate all high-risk and redundant roads as determined by a complete Roads Analysis. Road decommissioning must be done prior to treatments to ensure that decommissioning is achieved and not overshadowed by the thinning and burning treatments, or that funding for decommissioning is not diverted for fire suppression activities.

Culverts of obliterated roads should be removed and restored to reduce the effects these have on sedimentation, water quality, and soil productivity.

Response 14-106. Transportation, temp roads, timeframes.

Historically, past NEPA decisions allowed for temporary roads to be constructed, used, and obliterated in the same season. Implementation of these decisions found that it was the rare instance when a temporary road remained open for more than one operating season.

It has only been in the last few years that NEPA decisions have stated that temporary roads may be open for one to three years. Through timber sale contract implementation, again, it will be the rare case that a temporary road will remain open for more than one season. While the up to 3 year timing does provide more flexibility to a logging contractor, they normally do not want to have the additional expense of meeting mitigations necessary to keep road open over the winter. The majority of the time, they will still construct, use, and obliterate in the same season.

Response 14-107. Transportation, enforcement of closures temp roads. Please refer to the response to comment 14-95 for a discussion of the need for temporary roads. Refer also to the response to response 14-48 for a discussion of the road decommissioning process. The important points to take from these discussions are: (1) temporary road construction is necessary to satisfy the project Purpose and Need, and to contribute to the economic viability of the project; (2) all temporary roads will be decommissioned within three years following their construction; and (3) every effort is made to limit unauthorized incursions on decommissioned roads.

Response 14-108. Transportation, decommissioning, high risk roads, and roads analysis. See Response 14-91 regarding high-risk roads and decommissioning.

A roads analysis (conducted as part of this project) identified roads deemed not essential to management of the proposed project area and were considered as candidates for decommissioning (refer to Appendix C and H). Although additional roads will probably not be recommended for decommissioning for this particular project, we will continue to reevaluate the need for our roads and decommission more roads as conditions allow.

A roads analysis consistent with the requirements of section 7712.13c of Forest Service Manual 7700 (FSM 7700) – Transportation System was conducted as part of this project. All roads within the project area that were deemed not essential for future management of the affected areas, and the decommissioning of which would presumably benefit watershed health were proposed for decommissioning.

Response 14-109. transportation, culverts, decommissioning.

Removal of drainage structures, including culverts, is, in general, an element of the decommissioning process, regardless of the method of decommissioning.

Where roads are removed, care must be taken to minimize sedimentation, remove noxious weeds, revegetate the area with native plants, and strictly enforce road closures. The obliterated road should be gated, signed, and patrolled to prevent incursions by ORVs.

While road obliteration will improve water quality in the long term, road obliteration and reconstruction will inevitably entail soil disturbance and short-term increases in sedimentation rates. Additional mitigation measures, such as stream bank stabilization upstream and downstream of the site, are needed which guarantee no near-term net increases in soil disturbance or sedimentation in the watershed as a whole.

All culverts should be removed from obliterated roads. Culverts that are not maintained may lead to blocked drainages and eventual blowouts.

Proper road maintenance is critical for any remaining roads if sediment is to be controlled. The Forest Service should detail the maintenance plan for all roads in the project area.

Road closure is a contentious issue, especially in Idaho County, but is simply the best way to restore watersheds suffering from legacy problems. Permanently closing all non-essential roads will save money, protect water quality, protect wildlife, and safeguard endangered species and their habitat.

Response 14-110. Transportation, sedimentation, closures, decommissioning
Please refer to response 14-91 for methods of road closures and enforcement following decommissioning. Please see response 14-111 sedimentation control and re-vegetation of decommissioned roads.

Response 14-110b. Transportation, closures, decommissioning

Stream crossings are given special attention during design and implementation of road obliteration projects. Site-specific best management practices are employed to minimize short-term sediment yield and to enhance stability of the stream and adjacent slopes. Within the crossing site, measures might include dewatering, drop structures, placement of large wood, mulching, seeding, and/or planting. Temporary sediment traps might be utilized downstream of the crossing. In some case, channel gradient and steps need to be reestablished upstream of the site. The mix of measures applied will vary based on site characteristics.

Response 14-111. Culverts, road decommissioning.

Please see response 14-109 regarding culvert removal on obliterated (decommissioned) roads.

Response 14-112. Road maintenance.

Each forest system road is, and would continue to be, maintained in a manner consistent with the road management objectives established for the road, if sufficient funding is available to do so. Please refer to Appendix C of the FEIS for descriptions of the road management objectives, as well as a list of road management objectives for each road in the project area.

Response 14-113. Transportation, road closure.

Please see responses 14-94 and 14-108 regarding determination of road closure candidates within the project area.

Goshawks

The DEIS failed to specify whether project nest site mitigation will occur if Goshawk nests are located. This is inadequate. The Forest Service should leave a 30-acre buffer around active and previously existing but unoccupied nest sites as specified in the *Management Recommendations for the Northern Goshawk* (Reynolds 1992). Due to parasites or previous disturbances, goshawks often alternate between existing nests. These existing alternate nests may well be located within or adjacent to the proposed patch clearcuts and other units. The proposed action could remove or make these otherwise viable nests unusable.

The Forest Service failed to address the fact that harvest units adjacent to previous units could create combined openings that are too large to be used by goshawks.

Response 14-114a. wildlife, goshawk, nest mitigation.

Table II-3, Project Design Item 29 states (DEIS page II-15), “Should any of the following be sighted in the project area during project implementation, the Unit Biologist would be notified: lynx or a lynx den, bald eagle, new wolf den or rendezvous site, active goshawk nest.” Project Design Item 35 (DEIS page II-16) states, “Trees with obvious large cavities or stick nests, would be evaluated to determine if the tree should be retained or if other management actions need to occur...” Table II-4, Mitigation Measures Item N (DEIS page II-21) states “Should an active goshawk nest be discovered within 450 feet of timber or fuel reduction activities the nest will be protected, as well as a 10-15 acre no-treatment buffer area around the nest tree, as designated by the unit biologist to provide for foraging and nesting sites.” In the FEIS, this mitigation measure has been modified to protect a **30-acre** no-treatment area around the nest tree.

The goshawk uses a variety of structural/age classes and habitats to meet its life history requirements. With the majority of the harvest within the Red River drainage having occurred between the 1950's and 1980s, these areas are fully stocked and could provide foraging habitat for goshawks. New units would create openings, which in turn would provide habitat.

Response 14-114b

Direction in Forest Service Manual 2471.1 states that the size of openings created by even-aged silvicultural treatments in the Northern Rockies will normally be 40 acres or less, with certain exceptions. One of those exceptions (1) includes catastrophic events such as fire, windstorms, or insect and disease attacks. In these cases, the 40-acre limitation may be exceeded without 60-day public review and without Regional Forester approval, provided the public is notified and the environmental analysis supports the decision. This documentation in Appendix J of the FEIS, of the proposed creation of these openings constitutes public notification.

Reynolds et al. (1992) states openings managed in goshawk habitat should be no greater than 4 acres. If we were managing this landscape for only goshawks, perhaps this would be a consideration. However, our mandate is multiple resource management and the Forest Plan directs that Red River watershed be managed in this multiple-use concept. There would be 524 to 798 acres (4 to 6 percent) of goshawk habitat treated, depending upon the Alternative selected. The FEIS displays this information in Table III-25. The patch sizes in all alternatives would be larger than 4 acres. The majority (76%) of the treatments proposed under all action alternatives in potential goshawk habitat would be shelterwood treatments. This type of silvicultural prescription would retain valuable nest trees. RHCAs in these stands would also remain untreated in Alternatives C, D and E. Additional goshawk analysis considering Reynolds et al. (1992) was completed between the DEIS and the FEIS. See the FEIS (Wildlife – Northern Goshawk section) and the project file for the additional information.

In addition to protecting existing alternate nests, the *Management Guidelines* specifically recommend that a minimum of three presently suitable nest areas of 30 acres each should be maintained per home range. These nest areas are usually mature old trees and dense forest canopies: “No adverse management activities should occur at any time in suitable nest areas” (Reynolds et al. 1992).

For each goshawk home range, the Forest Service should have identified three 30-acre stands of present nest sites for a total of 90 acres.

In addition to protecting three suitable nest areas, the *Management Recommendations* also suggest that land managers identify and prepare three 30-acre stands of replacement nest sites for a total of 90 acres in the event that the original nest sites are lost in a wildfire or other event. The Forest Service should manage these replacement sites to ensure future stand conditions consisting of dense, mature stands with high tree cover and high basal area.

Response 14-115. wildlife, goshawks, openings.

See response to Comment 14-117. The Nez Perce Forest has not inventoried all potential goshawk nesting habitat in the project area, thus protecting currently unknown nests is not possible at this time, but a 30-acre buffer would apply to newly discovered nests as well as known nest locations. Further, Forest Plan old-growth stands which tend to have disproportionate amounts of nest selection characteristics preferred by goshawks are protected from all harvests, further reducing risks of unknown nest habitat losses to harvesting. Action alternatives retain between 11,827 and 12,279 acres of goshawk habitat. This habitat is well distributed in the watershed (project file map). Using the 90-acre recommendation you suggest, there would be ample habitat available to sustain goshawks in Red River watershed.

Management recommendations proposed by Reynolds et al., 1992, were developed specifically for the southwestern United States. Thus, it would be inappropriate to apply these guidelines to the moister, intermountain west. Given that this project will not harvest Forest Plan old growth stands and that active or newly discovered goshawk nests will be protected, goshawks nests should be adequately protected. Refer to the Wildlife – Old Growth and Wildlife – Northern Goshawk sections in the FEIS for more information.

Any and all patch cuts within the entire home range/foraging area should be four acres or less with reserve trees in order to be consistent with the Management Recommendations (Reynolds et al. p. 26):

Openings (up to 4 acres), for herbaceous and shrubby understory development and tree regeneration, are desired in ponderosa pine and mixed-species forests; smaller openings are desired in spruce-fir forests (Reynolds et al. 1992, p. 6).

Because goshawks are forest and forest-edge predators that scan for prey from trees, creating openings larger than 4 acres effectively removes these areas from goshawk foraging habitat and departs from VSS requirements for openings in the Management Recommendations.

Given the lack of guidelines for Goshawk management in Region 1, the sensitivity of goshawks to disturbance via logging, and the scope of the project, management should rely on the Management Recommendations to ensure an appropriate level of protection.

Flammulated Owl

There is inadequate information provided regarding the Flammulated owl. While it is stated that there is limited owl habitat within Red River, an estimate of how many owls are located in the area is appropriate.

Given the extent of logging in the area, it is likely that there would be impacts on the limited population that is present in the area. These impacts should have been fully considered in the DEIS, and must be duly incorporated into subsequent NEPA analysis.

Response 4-116. wildlife, goshawks, patch cuts.

Please see response 14-114b.

The purpose of the project is to reduce existing and potential forest fuels, encourage conditions for sustaining long-lived, fire tolerant conifer species, and contribute to both the economic and social well being (safety & economic security) of local residents. Within this broader objective, we sought to design a compromise approach, incorporating mitigations as needed to minimize impacts on goshawks and their habitats.

Response 14-117. wildlife, goshawk management

Given the scientific support behind larger nest protection areas, the protection area size for confirmed nest trees has been increased to 30 acres. Considering the fact that the large tree component and higher canopy closure preferred by goshawks for nesting will, in many cases occur within old growth, and the project harvests no old growth stands (either Forest Plan or North Idaho standards) nor in Riparian Habitat Conservation Areas, existing and historic nests identified during layout goshawk nests should be adequately protected. See Chapter 2: Mitigation and Design Measures in the FEIS.

Response 14-118. wildlife, flammulated owl

Based on Forest-level survey that included surveys in Red River District (Shepherd and Servheen 1992), no flammulated owls are known to occur on Red River District or the South Fork Clearwater River Sub-basin. There have been no flammulated owl sightings documented. Based on the limited amount of habitat in Red River, it is not expected that flammulated owls would occur in Red River.

Preferred flammulated owl habitat would be described as xeric habitats in the large tree size class. There would be no treatments in xeric habitat types (defined by habitat type groups 1 and 2) in large trees size (>21 inches DBH) treated under any alternative. Per Table II-3, item 34 of the DEIS, "All large ponderosa and western larch trees and snags would be maintained." Where there is mixed conifer habitat treated, these important habitat components would remain in treatment areas.

Pine Marten, Fisher, Wolverine, Lynx and other wildlife species

While identified old growth stands are supposedly “avoided” under the project, we believe the impacts of the Proposed Action on pine marten and Fisher are dramatically understated. Other analyses have acknowledged that clearcutting of mature stands and habitat fragmentation have “seriously affected distribution of marten” (Crooked American DEIS, 308), and “while habitat quantity has increased, habitat quality has likely declined due to loss of larger snags and habitat heterogeneity from fuelwooding, fire suppression, and loss of large diameter trees due to past timber harvest.” Because of the significant extent of logging and clearcutting proposed under the project, the impacts of each alternative appear to be inadequately analyzed. According to *Forest Management Guidelines for the Provision of Marten Habitat* (Robert Watt, et al.), gaps of open habitat more than 1-2 kilometers should be avoided. The project proposes significant clearcuts that would exceed this recommended standard.

Habitat fragmentation and the proven subsequent decline in pine marten populations appear to be inevitable under the Proposed Action.

Response 14-119a. wildlife, MIS, TES, old growth

Pine marten habitat was defined by medium and large trees in habitat type groups 4, 7 and 8. There are 7088 acres of potential pine marten habitat in Red River watershed. We are not altering pine marten habitat by removing pole and small sized dead and dying lodgepole pine trees. Alternative B proposes treatments in 229 acres of potential pine marten habitat, Alternative C would treat 182 acres, Alternative D would treat 126 acres, and Alternative E would treat 112 acres. More specifically, clearcutting would occur on 19 acres of potential pine marten habitat in Alternatives B, C and D. Alternative E would clearcut 18 acres of potential pine marten habitat.

Fisher habitat was defined as habitat type groups 4, 7, 8 and 9 in medium and large trees size classes. There are 7188 acres of potential fisher habitat in Red River watershed. Alternative B proposes treatments in 229 acres of potential fisher habitat, Alternative C would treat 182 acres, Alternative D would treat 126 acres, and Alternative E would treat 112 acres. In addition, fishers are closely associated with riparian habitats. Alternative B would treat 1299 acres within RHCAs. Alternatives C, D, and E do not enter RHCAs for fuel reduction. More specifically, clearcutting would occur on 19 acres of potential fisher habitat in Alternatives B, C and D. Alternative E would clearcut 18 acres of potential fisher habitat.

Application of Watt et al. (1996) northwestern/northeastern Ontario Canada boreal forest recommendations are questionable in this north-central Idaho forest setting. Nonetheless, per your suggestion, additional analysis using Watt et al. criteria was conducted and is included in the FEIS Wildlife – Pine Marten section and in the project file.

In addition to considering Watt et al. (1996) for pine marten analysis, a companion document written by many of the same authors, for pileated woodpeckers was also considered (Naylor et al. 1996). In Ontario Canada, the recommendations state one or the other set of recommendations must be used in land management activities. In the Red Pines FEIS, we believe both were adequately applied. See the FEIS Wildlife – Pileated Woodpecker section for more information.

Response 14-119b.

See response to Comment 14-124 and the Wildlife section in the FEIS for more information on fragmentation.

The FEIS acknowledges effects of additional harvest and fragmentation effects on wildlife habitats. Work from Coffin et al. (2002) indicates that despite heavily logged and roaded areas, pine marten can tolerate and remain in such areas (see FEIS, Wildlife Section – Pine Marten). The analysis further discusses and assesses fragmentation effects and the impacts of activities.

There is no “proven subsequent decline in pine marten habitat”. Statements in the American Crooked project acknowledge impacts of past harvesting in changing the distribution of marten, not changes in the population.

We are concerned that the Forest Service has failed to adequately consider the impacts of the project on numerous wildlife species including, but not limited to, Marten, Fisher, Wolverine, Lynx and Pileated Woodpeckers.

In subsequent NEPA documents, the Forest Service should reveal models and assumptions relied upon to make Effect Determinations.

Further, the DEIS makes wild assumptions that the impacts of the project are minor, compared to the effects of the mountain pine beetle (DEIS, page III-202). This is erroneous and should be addressed in subsequent NEPA documents.

The DEIS also assumes that habitat for riparian dependent species is improving (as a result of PACFISH) with no population monitoring data (DEIS, page 203).

The DEIS (page 203) also claims that motorized access provides secure habitat for wildlife. What evidence and/or monitoring exists to demonstrate this?

The issue of fragmentation is not sufficiently addressed in the DEIS. With over 30,000 acres having been logged in the recent past, the proposal to log an additional 6,000+ acres, 588 miles of roads, the proposal to build 36 miles of temporary roads, and an unknown number of new permanent roads, fragmentation of habitat is especially pertinent. The effects of habitat fragmentation and disturbance on a variety of species must be analyzed and documented in subsequent NEPA documents.

For additional information, please see: **Watt, Robert W., et al. Forest Management Guidelines for the Provision of Marten Habitat. May 1996.**

Response 14-120a. wildlife, impacts to species.

Based on your concerns, additional analysis for pine marten, fisher, wolverine, and pileated woodpecker were conducted between the DEIS and FEIS. See the FEIS Wildlife section for more information.

Response 14-120b. wildlife, impacts to species.

The only model used in the effects analysis was the North Idaho Summer Elk Habitat Effectiveness Model (Leege 1984) as stated on page III-201 of the DEIS. Analysis indicators for each of the above mentioned species and others used in the effects analysis are displayed in Table III-52 of the DEIS. An assumption made is that habitat type groups by size class is an adequate means of identifying potential habitat for goshawk, fisher, pine marten, pileated woodpecker and black-backed woodpecker.

Response 14-121. wildlife reveal models for determinations, effects.

The DEIS (page 202) states, "Wolves, lynx, wolverine and big game may not be affected by the relatively minor amount of proposed activities. About five percent of the watershed is proposed for vegetative treatment compared to 70 to 75 percent of the watershed that has been affected by mountain pine beetle (DBH 6 inches or greater)." The preferred alternative, Alternative E, proposes treatment of 3% of Red River. To further explain...Stone (1995) indicates that habitats may have similar responses to canopy cover reductions whether the reduction is from mountain pine beetle or silvicultural treatment. Mitigation and project design features in the Red Pines proposal address many of the impacts mechanical treatments impose that would not occur by allowing mountain pine beetle to act without management (i.e. temporary road construction). The statement on page 202 (DEIS) was made considering proposed treatment acres (up to 6466 acres) compared to those impacted by the mountain pine beetle (about 94,500 acres).

Response 14-122. wildlife, riparian dependent species, PACFISH.

The DEIS (page 203) states, "For nearly 10 years, PACFISH implementation has reduced new effects to riparian habitat. Habitat conditions for riparian species are improving." This is based on comparing management practices prior to PACFISH with fewer and smaller riparian protection areas implemented in projects with full implementation of PACFISH. It is assumed that minimal new activities are occurring in riparian habitat conservation areas per PACFISH. It assumes that in 10 years, riparian habitats previously harvested have improved over time as vegetation recovers from previous activities. For terrestrial species, previously impacted RHCA habitats and unimpacted RHCA habitats are progressing through succession and terrestrial species are using those various stages of habitats accordingly. The statement referenced applies to habitat conditions, not wildlife populations.

Response 14-123. wildlife, habitat, monitoring evidence.

The statement on page 203 of the DEIS is "Existing motorized vehicle access management is effective at providing security habitat." To clarify, nearly 80% of the roads in Red River have access restrictions. Restrictions (yearlong and seasonal road closures) to motorized vehicles create secure habitat conditions. These restrictions are effective at providing security habitat.

Response 14-124. wildlife, fragmentation.

Patch characteristics and fragmentation are addressed in the Landscape Ecology Chapter 3 Section 3.8. The effects of roads are not addressed.

In response to your comment, a Wildlife Habitat – Fragmentation and Connectivity section was added to the Wildlife section of the FEIS.

Response 14-125. wildlife, reference pine marten.

Comment acknowledged.

Noxious Weeds

We are particularly concerned with noxious weeds because there is no comprehensive weed management strategy for this area. With the amount of commercial and recreational activity taking place on private and National Forest lands in this area, failure to coordinate efforts will make project-level strategies inadequate.

The Forest Service has failed to adequately address how the proposed project will adversely affect native species by allowing noxious weed importation and establishment.

The Forest Plan requires that the Forest Service minimize the creation of sites suitable for weed establishment (Noxious Weed Management, Supplement No, R1 2000-2002-1). The proposed action will not minimize and will in fact exacerbate the spread and establishment of noxious weeds through 36 miles of road construction and 92 miles of reconstruction.

Monitoring for weeds and acquiring adequate funding for weed treatments need to be required and guaranteed.

Although the Forest Service does not consider the weed situation to be severe, the Forest Service should realize that it is far cheaper to be proactive, in order to prevent infestation, as opposed to having lax standards and to allow the situation to deteriorate. This is a potentially large threat considering the level of disturbance that is proposed and the new road construction that will increase motorized vehicles in previously non-impacted areas, acting as vectors for new infestations of noxious weeds. Due to the limitations for herbicide application in these high-priority watersheds, action must be taken to avoid weed infestations and should have been addressed as part of this analysis.

Response 14-126. noxious weeds, comp plan

The Red River Watersheds fall within the Clearwater Basin Weed Management Area (CBWMA). The CBWMA is a community-based effort that brings together those responsible for weed management within the Clearwater River Basin, to develop common weed management objectives, set realistic priorities, facilitate effective treatment and coordinate efforts along logical geographic boundaries with similar landtypes, use patterns and problem plants. Partners involved in the CBWMA include Idaho County, Clearwater County, Lewis County, Clearwater NF, Nez Perce NF, BLM, Nez Perce Tribe, University of Idaho, Clearwater RC&D, Back Country Horseman and Private landowners. The intent of reducing risk of weed spread and establishment, treating small infestation before they expand, providing focus on the transportation network, and reoccurring surveys integrate many of the priority elements of the Clearwater Basin Weed Management Area. Coordination at multiple scales is a tenet of cooperative weed management programs across jurisdictional boundaries. As a result weed management efforts are coordinated across local, basin, regional and state levels by the community partnership of which the National Forest is an active participant.

Response 14-127. noxious weeds, native species.

The weed risk assessment in Chapter III is based on the susceptibility of the native plant communities in the project area, weed infestations found in the area, the level of disturbance and presence of spread corridors. The analysis found that the project will potentially add disturbance to areas that rate low, moderate or high for weed risk. To reduce the risk of continued weed spread, design and mitigation measures (Chapter II page II-17 and II-22 of the DEIS) and monitoring (Appendix I, page 4) are a requirement of the proposed project. Noxious weeds will not be allowed to spread nor establish as a result of implementation of the proposed project. Therefore, it is expected that no adverse affects to native plant communities will occur.

Response 14-128. noxious weeds, spread.

Through the analysis a set of project design criteria or mitigation requirements have been established to address the risk of weed spread and colonization resulting from the proposed project. These measures prevention measures, treatments, monitoring, re-survey of risk zones for changes in weed infestation and, where appropriate, the re-vegetation of disturbed soil (Chapter 2 Design and Mitigation Measures page II-17 and II-22 and Appendix I, page 4 of the DEIS). The implementation of these invasive plant measures would insure that weed spread from ground disturbing actions is minimized or eliminated.

Response 14-129. noxious weeds, monitoring.

Please refer to response 14-128 above, regarding noxious weed monitoring.

Response 14-129. noxious weeds, action.

The design and mitigation measures (Chapter 2 page II-17 and II-22 of the DEIS) and monitoring (Appendix I, page 4) were developed as a result of the risk assessment conducted as part of the analysis. They reflect a concern for the potential of weed spread from ground disturbing activities, taking into account the type and condition of the vegetation communities within the project area. The proposed mitigation is commensurate with the risk. Integrating project level actions within the broader context of a community-based strategy add strength to the overall weed management effort in the upper watersheds of the Clearwater Basin. Refer, also to response to response 14-126, above.

Restoring Fire-Adapted Ecosystems

Once the WUI areas on the Nez Perce National Forest have been treated, it may be appropriate to consider fuels reduction efforts extending into the forest in order to restore certain and selected fire-adapted ecosystems. However, such future projects must be based on the “best available science” that relates to reducing the intensity and severity of wildland fire. Further, the Wildland Fire Use program may be a cost-efficient and effective method to reduce fuel loads, restore fire-adapted ecosystems and to create heterogeneous landscapes that would be less prone to large-scale fire events. We are aware that WFU is outside the scope of this project, but feel that it is pertinent to consider the potential for WFU in certain areas, in lieu of currently proposed logging.

The Forest Service needs to compare present, historic, and post-treatment fuel loads and canopy densities for each unit within the proposed treatment areas.

The Forest Service needs to provide more quantified data on the current and target levels of crown densities in the project area.

In the WUI, we believe that the Forest Service should place less emphasis on reducing crown bulk density, and instead focus on thinning from below and removing ladder and ground fuels. Habitat loss is increased in areas cut by regeneration, seed tree or shelterwood logging, prescriptions that produce adverse effects for species relying on more continuous canopies such as snowshoe hare, lynx, pine marten, and fisher.

Response 14-130. fire, WUI, science.

While a Wildland Fire Use (WFU) program may be a cost-effective method to reduce fuel loads and restore fire adapted ecosystems, the Forest Plan and Fire Management Plan currently do not allow for WFU within any portion of the project area. Without the authority for WFU all fire ignitions within the project area require a suppression response.

Response 14-131. fire, fuel loads, canopy densities.

The text has been updated in the FEIS document to address the current, predicted future, and post-treatment fuel models for the project area. Please see the Fire/Fuels discussion located within Chapter 3 of the Red Pine FEIS and Appendix E.

Response 14-132. fire, fuels, WUI.

.See FEIS, Chapter III, Section 3..9

Response 14-133. WUI, crown densities, fuels, historic range, wildlife.

With respect to the WUI areas, any treatment done will result in the reduction of the crown bulk density of the stand, including thinning from below and removing ladder fuels, crown bulk density is defined as “the mass of available fuel per unit crown volume.” While these types of treatments (thinning from below and removing ladder fuels) are effective as a measure to keep fires from transitioning from a surface fire to a crown fire, they are not as effective in transitioning a crown fire back down to a surface fire. That transition of a crown to a surface fire is one of the things that larger blocks that have been harvested will accomplish. This will help to better protect the private property and road infrastructure within the WUI. Additionally these treatment areas will provide safe areas for firefighters to initiate suppression tactics within the WUI areas.

With respect to wildlife habitat, managing various habitat types to maintain or improve wildlife habitats can be done by mimicking fire regime and disturbance intervals. Thinning from below to remove ladder and ground fuels is generally consistent with fire’s natural disturbance patterns in low elevation sites dominated by ponderosa pine and dry Douglas fir types. However, moderate and higher elevation mixed conifer and spruce-fir zones experienced a various mix of both low and high intensity fires that created a mix of partially burned and completely regenerated sites creating the patterns of age classes and conditions necessary for the species such as lynx, snowshoe hares, fisher and marten. Exclusive use of “thinning from below” strategies would be inappropriate for higher elevation habitats because of failure to create early seral habitats critical to production of forage species such as snowshoe hares.

Lynx, fisher and pine marten are species of intermediate and higher elevation forests and are more closely associated with a mosaic of both late and early successional stages. Early successional stages can be created by high intensity fires, other natural events, or harvest. A small acreage of lynx denning habitat would be converted to early seral conditions by harvest, leaving much more than the minimum 10% denning required by the Lynx Conservation Assessment and Strategy guidelines. Fisher and pine marten prefer late seral habitats. Old growth habitat is considered important to fisher and marten and no old growth will be harvested with this project. Pine marten also are associated with complex ground structure. For pine marten, the strategy of thinning from below and removing ladder and ground fuels would be in direct conflict with the species needs.

After this analysis, the Forest Service should focus on those stands that are the farthest outside of the historic range (i.e. the 1% of the project area that exhibits frequent, non-lethal fire regimes).

Further, the above-referenced logging methods have the potential to increase fire risk in the short term, and therefore would be counter-productive towards meeting the fire risk reduction purpose of the project. Forest openings can result in increased wind speed and related blow-down, more rapid drying of the forest vegetation, and dense tree and shrub regeneration. Additionally, slash on the ground can lead to increased short-term fire risk as has been demonstrated throughout the industrial forestlands of North Idaho and beyond.

On south-facing slopes, the Forest Service should reduce the number of shade tolerant species. On north-facing slopes, canopies are historically denser with a greater abundance of shade tolerant species. Thinning efforts on north-facing slopes should be concentrated within the WUI so that natural mixed-lethal fires will not threaten structures. Many Lodgepole Pine stands normally experience stand-replacing events and may not in fact be outside historic fuel loads or be in danger of uncharacteristic wildfires.

Response 14-134. fire, historic ranges.

Comment acknowledged. By only focusing on the stands that are farthest outside of their historic range, we would not meet the purpose project which is related to reducing existing and potential forest fuels by removing the dead, dying, and downed trees that would otherwise result in high fuel loadings.

Response 14-135. fire, logging methods, fire risk.

As stated in the hazard discussion of the Fire/Fuels section of the FEIS, it is acknowledged that the short-term risk of a high severity wildfire is possible between the time of the vegetation treatment and the slash disposal is completed. The long term benefits of the treatments, modified fire behavior and lower future fuel loadings, outweigh the short term risk. Additionally after the slash disposal is completed the fuel loadings within the treatment units will be less than 12 tons per acre. If the treatments are not completed and stands continue to transition to Fuel Model 10 and 13 we would see fuel loadings in excess of 12 tons per acre.

Response 14-136. fire, thinning, south aspects.

See FEIS, Chapter 3, Section 3.10.

The vast majority of all acres proposed for treatment regardless of aspect are in the mixed severity or lethal fire regime. Silvicultural prescriptions are based on relevance to meeting the stated objectives within the purpose and need. How well a stand meets criteria depends upon the vegetative condition of the stands as well as the juxtaposition to the WUI, past treatment areas and determined fire protection areas. Social and economic values in the WUI are not the only resources at risk from wildfire in the project area.

Forest Succession

The DEIS fails to recognize the role that Mountain Pine Beetles play in the successional stages of the forests. Lodgepole Pine is a seral species and should be recognized as such in the subsequent NEPA documents. While in certain areas, Lodgepole Pine can be viewed as a type of climax species due the long fire interval (i.e. as witnessed at Yellowstone National Park), throughout much of the West, beetles and other disturbance mechanisms play an integral role in the succession through to climax forests. While fire may play a role in some of these forests, the DEIS gives the impression that there are two stark options: Clearcutting or Stand Replacing Fire. Is this the position of the Nez Perce National Forest? This is misleading and disingenuous.

Response 14-137. fire, thinning, north aspects.

Refer to response 14 -136.

Refer to the first two stated objectives of this project (FEIS, Chapter 1, Section 1.5). The vast majority of all acres proposed for treatment regardless of aspect are in the mixed severity or lethal fire regime. Silvicultural prescriptions are based on relevance to meeting the stated objectives within the purpose and need. How well a stand meets criteria depends upon the vegetative condition of the stands as well as the juxtaposition to the WUI, past treatment areas and determined fire protection areas. Social and economic values in the WUI are not the only resources at risk from wildfire in the project area.

Response 14-138. forest succession, mtn pine beetle.

The DEIS describes the role insects play in forest dynamics. (See Disturbance Regimes, DEIS III-123).

Note the purpose and need for this project (DEIS pp. 1-2 and 1-3) is to reduce fuels, improve human safety, and contribute to the economic and social well being of residents and visitors to the project area. The purpose of Red Pines project is not to provide long term prevention, suppression or control of mountain pine beetle populations in the project analysis area.

This project is consistent with direction provided by the Forest Plan (DEIS 1-4 to 1-6, Forest Plan Implementation).

While your analogy regarding the lodgepole pine and mountain pine beetle cycle is accurate, fire, including large stand replacing events, is also an integral component of the inherent disturbance regime in the project area. This is well evidenced by the even aged character of large blocks of unmanaged stands, cone serotiny in lodgepole pines, fire scars on trees, burned stumps and charcoal in soil layers throughout the project area. It is beyond the scope of this project to attempt to determine what, if any treatment sequence would occur in response to subsequent infestations 80 years or more in the future.

Following implementation of the project, it should be expected that dense thickets of Lodgepole Pine would regenerate in the logged areas. In the course of 80 years, this will result in beetle-susceptible stands and if current ideology continues to plague the Forest Service, this will necessitate identical treatments at that time. This is the long-term outlook for the project area, based on the likely scenario. This sequence of events should be considered in the subsequent analyses, and particularly in the economic analysis.

Instead, consideration of natural successional mechanisms should be evaluated, along with warranted watershed restoration.

Prescribed Burning

Thinning and regeneration harvests, alone, often result in greater amounts of hazardous fuels (slash) on the ground than prior to treatment, which may actually increase the short-term risk of high-severity wildfire. This is revealed in the DEIS (III-15) in discussions regarding soil chemical properties. Subsequent NEPA documents must recognize this factor, even where slash disposal is proposed, timing of slash disposal is contingent on numerous factors which may not be met in a timely fashion.

We encourage the Forest Service to expand the use of prescribed burn only prescriptions, in efforts to decrease fuel loads and create a mosaic of varying age-classes. It appears from Appendix E, where the silvicultural treatments are described; that the only burning accomplished will be in areas that have been logged. In order to meet the purpose and need of the project, burn only treatments are appropriate and warranted and should be considered in subsequent NEPA documents.

Response 14-139. forest succession, lodge pole.

The scenario described in the comment is an accurate description of the expected life cycle of Lodgepole pine habitat. However, it would be highly speculative to include in a current economic analysis, a similar treatment with similar costs what would be done eighty years from now.

Response 14-140. natural forest succession, lodge pole.

Natural forest succession are considered in the disturbance regime discussion of the DEIS (DEIS III – 123), as well as in vegetation section (DEIS III - 147).

Response 14-141. prescribed fire, fuel loads.

See response 14-135 for a discussion of hazard and the Fire/Fuels section of the FEIS.

Response 14-142. prescribed fire, prescription expansion.

The use of prescribed burning only will not effectively reduce the fuel loading within the stands to be treated. If the burning only is done under the existing live canopy of the stands one of two results will happen; 1) the fuels will be too wet to remove enough of fuels to be effective (spring/late fall burning), 2) the burning would occur during conditions (summer/early fall) when control of the fire will be difficult to control and the risk of adverse results happening are too great (high probability for fire to become uncontrolled and transition to a wildfire).

After further review it became apparent that acres that could be treated with underburning without prior treatments, and a low mortality to overstory trees, would reduce the acres treated to a very small percentage of the total acres that needed to be treated. Therefore, this alternative was dropped as it did not adequately meet the purpose and need of the project.

Where uncharacteristic or continuous fuel loads exist, mechanical treatments may be necessary prior to prescribed burning. These treatments should not focus on increasing canopy spacing by removing larger trees, but should remove ladder fuels and brush build ups. Care should be given to areas directly adjacent to the base of large diameter trees. Debris and fuels should be removed from these areas to protect tree roots and cambia. The Forest Service needs to provide details of how and when these adjacent areas are to be treated.

According to the DEIS (II-7) a prescribed burn only alternative was considered, but dropped from further consideration. The alternative considered underburning, with low mortality to overstory trees. Instead, an alternative should be considered that dramatically increases the acreage of prescribed fire, including some moderate to high severity burns. This could likely accomplish the purpose and need of the project, sustain natural ecosystem processes and reduce the negative impacts associated with excessive logging and road building. By defining the prescriptions of a “prescribed burn only alternative” so narrowly, the NPNF eliminated the potential for the alternative to meet the purpose and need for the project. This is inappropriate and an alternative that includes a significant component of landscape burning (i.e. moderate to high intensity fires) that would not require pre-treatment through thinning or logging should be reconsidered.

Response 14-143. prescribed fire, fuel loads, mechanical treatments.

Large diameter trees over 21 inches will not be harvested within this project. Mechanical treatments of uncharacteristic fuel loads will include timber harvest to remove and capture economic value and fund other treatments. The other mechanical treatments prescribed for the treated area will vary by stand and circumstance (slope, fuel load, soils, etc), but may include yarding of unmerchantable material, machine or hand piling of excessive organic material, pull-back of fuels from leave trees, jackpot burning of concentrations and piles, underburning, or broadcast burning. All treatments will have site-specific silvicultural prescriptions and burn plans will be developed and implemented for any burning activities (DEIS 2-10 through II-18).

Mechanical treatments of uncharacteristic fuel loads will include timber harvest to remove and capture economic value and fund other treatments. The other mechanical treatments prescribed for the treated area will vary by stand and circumstance (slope, fuel load, soils, etc), but may include yarding of unmerchantable material, machine or hand piling of excessive organic material, pull-back of fuels from leave trees, jackpot burning of concentrations and piles, underburning, or broadcast burning. All treatments will have site-specific silvicultural prescriptions and burns will have a burn plan.

Response 14-144. prescribed burning, alternatives, increase amt of rx burning.

A prescribed burning only alternative was considered as described in the DEIS, Chapter 2, page II-7.

Silvicultural Prescription

Thinning forests is a generally accepted component of decreasing the risk of a severe fire event on south-facing slopes with dry forest types that were historically characterized by low density stands of ponderosa pine with large openings between trees. In order to justify this sort of thinning activity, subsequent NEPA documents should contain substantive information concerning the historical nature of these forests. This will help to establish a stand density target that is within the historical range of natural variability. According to the DEIS though, only a small portion (approx. 1%) of the project area represents this forest type.

On north-facing wetter forest slopes, a mixed severity or lethal fire regime was more common, as is evident in the DEIS' descriptions. Thinning here should be concentrated around the WUI. We recommend that no even age treatments be implemented outside the WUI. Clearcuts, shelterwood and reserve tree logging activities transfer fuels from the canopy to the ground and increase hazardous fuel loading, exacerbating the effects of wildfire. Also, clearcuts and similar logging prescriptions increase the potential for severe blowdowns by increasing wind speed and decreasing shelter to the outlying trees, again increasing the amount of hazardous ground fuels. Clearcuts also encourage rapid regeneration in Lodgepole pine forests. A dense layer of small saplings and young trees could support a rapid-spreading low crown fire and increase the risk of a large-scale wildfire. Any efforts to thin Lodgepole pine should maintain a sufficient density of trees to serve as windbreaks for each other and to prevent windthrow.

We are concerned with the statement that currently uninfected but "high risk" trees would be harvested given the fact that, "There is little opportunity to further prevent additional mountain pine beetle Lodgepole pine mortality in the Red River, Crooked River, and American River watersheds (Red River Salvage EA. p. 1). This statement is based solely on short-term economic goals and has no ecological value: Mountain pine beetles prefer larger-diameter Lodgepole pine, implying that all larger trees could be harvested. Further, according to discussions with leading forest pathologists, it is impossible to predict where Mountain Pine Beetles will go, and therefore these stands should not be logged.

Response 14-145. silviculture, prescriptions, dry forest types.

While less than 1% of the project area is ponderosa pine cover type, no treatments are proposed in this cover type under the Red Pines project. A prescribed fire project (Blanco Burn, see cumulative effects discussion DEIS p. III -148) is planned to maintain this cover type in the Red River drainage. In other mixed conifer stands where ponderosa is a component, this species would be favored for retained or reintroduction (see DEIS p. I-2).

Response 14-146. silviculture, thinning, WUI.

Please refer to response 14-137 for a discussion of treatments on north-facing slopes.

Response 14-147. silviculture rx, thinning, mtn pine beetle, high risk

Green trees would be left in all stands, including pure lodgepole pines stands, if still alive to meet green tree replacements for snags (DEIS II-6, and appendix F). Fuel reduction treatments would occur in up to 6% of the analysis area. Economics are not the sole purpose and need for the Red Pines project. Please refer to the DEIS purpose and need for the project (DEIS I-2 and I-3). The beetle epidemic currently covers the entire Red Pines analysis area, and the majority of stands in the analysis area with a lodgepole pine component exhibit mortality due to mountain pine beetle infestation.

Larger diameter trees that are more resistant to ground fire should be left behind. The Forest Service needs to define and implement diameter limits and spacing between crowns for each treatment. Dead and dying Lodgepole pine stands that are beyond the range of current road systems should be left to regenerate naturally, or provide opportunities for climax species, in order to maintain natural ecological cycles.

Silvicultural treatments

The methods that are proposed to log trees from the project area are likely to compact soil, increase erosion, and incur more disturbance than is acceptable. In areas where treatments are ecologically appropriate, the Forest Service should select harvesting techniques with the least amount of soil disturbance. Multi-span cable yarding with a full-tree suspension system and helicopter logging should be considered instead of tractor-jammer systems where feasible.

We recommend that any and all harvesting occur over frozen or dry soil, with recognition of sensitivity to nesting or denning species. An increase in hand thinning and a decrease in mechanized thinning would also lower detrimental soil disturbance factors. Hauling and skidding techniques that destroy ground cover, expose mineral soil to erosion, and compact soils for reduced absorption and increased runoff should be specifically prohibited.

Subsequent NEPA documents should be specific in terms of the vehicles allowed to operate in order to reduce the potential impacts to soils and vegetation. All logs need to be removed by carrying the entire tree without dragging it and disturbing the soils.

No logging within RHCA's should be permitted.

Response 14-148. silviculture rx, large trees fire resistance.

Medium to large trees would be favored for retention. See DEIS III-145.

Since the project area does not have an approved WFU plan, current policy mandates that natural ignitions be suppressed throughout the project area. As a consequence, the role fire is allowed to play in maintaining and regenerating lodgepole pine stands is very limited in the Red Pines project area. Climax species are increasing in lodgepole pine stands throughout the project area, at least in part because the natural fire cycle has been interrupted by fire suppression.

Response 14-149. silviculture treatments, logging methods.

Logging systems are chosen based on a combination of cost, terrain, and silvicultural prescription and are described in Chapter two of the DEIS. Cable logging is prescribed for about 63 percent of the proposed harvest acres and ground-based systems for 35 percent. Effects of ground-based logging including compaction, displacement and erosion are analyzed in the soils discussion in Chapter three of the DEIS. Extensive design criteria and mitigation measures have been developed for this project to limit detrimental soil physical disturbance from ground-based logging (DEIS Tables II-3 and II-4). Monitoring is also proposed during and after implementation to validate soil resource protection measures. Monitoring will be done to identify units with cumulative soil disturbance in excess of Forest Plan standards and they will be treated through post-activity soil restoration work. (See the Monitoring Plan in DEIS, Appendix I.)

Response 14-150. silviculture treatments, logging methods, soils.

Please see response 14-148 and 14-149 regarding logging methods. See also Chapter 3, Soil section of the DEIS regarding potential soil effect from vehicles, as well as Tables II-3 and II-4. See FEIS Chapter III, Section 3.4.

Response 14-151. silviculture treatments, within RHCA

See FEIS, Chapter II, Section for a description of the proposed alternatives. Alternatives C, D, and E do not propose logging within RHCA's.

Ground-based logging systems and excavator piling of slash should be minimized, and higher intensity landscape burns should be considered to prevent continuous fuel loads. It is unfortunate that so many of the units will be ground-skidded and machine piled, as the impacts from this are much more severe in terms of soil compaction, erosion and sedimentation.

This gives the clear impression that the primary objective of the project is to maximize net economic return. It should be noted that this is not one of the stated objectives in the Purpose and Need section.

Species Protection

A thorough field survey for threatened, endangered, and sensitive plants and animals should be undertaken as part of the biological assessment. Areas containing threatened, endangered, and sensitive plant and wildlife species within the proposed treatment areas should be mapped, avoided, and monitored prior to and after management activities.

Response 14-152. silviculture treatments, logging methods.

See response 14-148 and 14-149 regarding logging methods. Also see DEIS Tables II-3 and II-4. See the response to 14-82 and 3-7.

At this time the lands within the project area have no approved fire use plan and the risks in using prescribed fire at mixed and lethal severities is considered too high in this area, without prior mechanical fuel reduction.

Response 14-153. silviculture treatments, economic return

The purpose and need statement is balanced, clear, and consistent throughout the development of this project. It is appropriate for conditions within the project area and follows the Forest Plan and addresses issues raised during scoping.

One purpose of the project is to reduce current and future fuel loads within the watersheds which are being affected by the mountain pine beetle; it is not designed to solely reduce the risk of catastrophic wildfire to Elk City. The proposed treatments would modify fire behavior by lowering fire intensities for fires occurring in the treatment areas, which would help to protect resource values of all types within the watershed such as; water quality, wildlife habitat, old growth, recreation opportunities, and air quality as well as infrastructure investments such as roads, bridges, campgrounds, etc. The result of having lower fire intensities would give fire suppression resources the opportunity to utilize the treatment areas during suppression activities, which would allow for the control of a fire at a smaller size, less cost, and less resource loss within the watersheds.

The project objectives are discussed in the Purpose and Need For Action Chapter II, Section 1.5 of the FEIS. The second paragraph of the section defines one purpose of the project to “contribute to the economic and social well-being of people who use and reside within the surrounding area.” By entering (treating) mixed conifer stands, additional economic gains can be gained.

Response 14-154. trees plants

Threatened and endangered species are designated under the Endangered Species Act. According to U.S. Fish and Wildlife Service list #1-4-04-WP 612 (letter dated 9/01/2004), threatened or endangered plant species, including their habitat are not found in the Red River watershed. Therefore a biological assessment for the project proposal is not necessary. This is explained under Threatened and Endangered species on pages 162-163 of the DEIS. This explanation has been moved under the Regulatory Framework heading in the FEIS.

In FSM 2670.22, management direction for sensitive species is in part, to ensure that species do not become threatened or endangered, because of Forest Service actions and to maintain viable populations of all native species. The most recent update to the sensitive species list was published on October 28, 2004. The Forest Service must evaluate impacts to sensitive species in a biological evaluation.

Extensive field surveys for sensitive plant species and habitat were conducted during the field seasons of 2002, 2003, and 2004. These surveys included virtually all units proposed for management under all alternatives as well as other areas of suitable habitat outside proposed management units. These surveys are documented in the project file and are referred to in the DEIS on page III-161 under the Analysis Methods heading. Species occurrences are mapped and documented both in forest files and with the Idaho Conservation Data Center (ICDC), which is the state agency responsible for compiling such information. Periodic tracking of species occurrences both by the ICDC and the Nez Perce National Forest occurs as appropriate. This monitoring may include field visits to update occurrence data or formal plots that measure response to disturbance or long term trends. In the project area, plots monitoring candystick (*Allotropa virgata*) have been in place for several years.

All activities within riparian areas should conform to PACFISH and INFISH standards.

The Fish and Wildlife Service and NOAA Fisheries need to evaluate this assessment in a Biological Opinion. The most appropriate species should be selected as indicators to assess ecosystem integrity before, during, and after the proposed treatment.

The assessment should describe the effects of the proposed activities on all forest indicator species for each treatment site.

Response 14-155. fish, pacfish, infish.

INFISH does not apply to streams on the Nez Perce National Forest. Please see Responses 14-43, 14-42, 13-23, and 4-7.

Response 14-156. fish, consultation, indicators.

In 1987, the current Forest Plan recognized westslope cutthroat trout, steelhead trout and spring Chinook salmon as management indicator species that occurred on the Nez Perce National Forest (USDA, 1987). Since then, steelhead trout and bull trout have been listed as threatened under the Endangered Species Act (Federal Register Vol.62, No. 159, August 18, 1997, and Federal Register Vol. 63, No. 111, June 10, 1968).

Steelhead trout and the bull trout have both been listed as threatened under the Endangered Species Act (Federal Register Vol. 62, No. 159, August 18, 1997 and Federal Register Vol. 63, No. 111, June 10, 1998).

In 1999, USDA Forest Service Northern Region Sensitive Species list was updated and it now includes not only westslope cutthroat trout and spring Chinook salmon but added to the list was interior redband trout. Redband trout will likely be considered threatened under ESA like steelhead trout.

The management indicator species have been reviewed in relation to this proposed project (FEIS, Section 3.6 and Section 3.12). and cumulative effects to management indicator species and their habitats are described in the FEIS, Chapter III, Section 3.6 and 3.12.

During the project planning process, the Forest Service will consult with the Fish and Wildlife Service and NOAA Fisheries when the project has impacts to Threatened, Endangered, and Proposed species. The Forest Service prepares a biological assessment for Federally listed or proposed species. The Fish and Wildlife Service prepares a biological opinion and NOAA Fisheries when there are adverse effects to federally listed species. The Fish and Wildlife Service and NOAA Fisheries do not consult on Forest Service management indicator species.

A Biological Assessment has been completed and consultation with NOAA Fisheries and US Fish and Wildlife Service in progress as required under ESA (FEIS and ROD). A Biological Opinion has not been issued at this time.

Response 14-156a.

The effect of the proposed activities on all terrestrial forest management indicator species occurring in Red River watershed have been addressed in the Wildlife section of the DEIS and FEIS.

Treatments need to be timed to reduce the impact on nesting birds and denning mammals.

Response 14-157. wildlife, nesting birds.

Table II-3 Project Design Measures Item 36 (DEIS page II-16) states, “Timing of prescribed burning would be coordinated with the Unit Biologist, Silviculturist and Fuels Management Specialist to achieve objectives and reduce impacts to species during important reproductive and natal period, as well as other resources.”

In addition to the direct impacts these treatments will have on local populations, the cumulative or linked impacts of these activities on adjacent populations needs to be considered.

Response 14-158. wildlife, cumulative effects.

Within the FEIS, the cumulative effects or linked impacts are addressed in Chapter III, Wildlife section 3.12. In the FEIS Wildlife section there is a cumulative effects section for each species. Additional cumulative effects analysis is included in the FEIS at the beginning of Chapter III (section 3.2) and Wildlife – Cumulative Effects on Wildlife in Red River Watershed.

The fragmentation of wildlife habitat by the proposed treatments needs to be more thoroughly assessed. The effects of regeneration harvesting on species dependent upon contiguous forested habitat, old growth, dead trees and other habitats should be considered. We are particularly concerned that the proposed action has the potential to negatively impact Chinook Salmon, Steelhead Trout, Redband Trout, Bull Trout, Westslope Cutthroat Trout, Lamprey, American Marten, Fisher, Wolverine, Moose, Elk, Goshawk, and Canada Lynx.

Response 14-159. fish, wildlife, fragmentation, regeneration harvest effects.

See response to Comment 14-124.

The wildlife section 3.12, in the FEIS contains information regarding fragmentation of wildlife habitats. See FEIS, Chapter III, Section 3.6.8 for effects to fish species.

Snags

A sufficient number of snags need to be left standing in each treatment area for cavity nesters until snags can be replaced by natural recruitment. Standing trees need to be overstocked to ensure sufficient habitat until new trees mature.

Fallen snags that lean against other trees serve as important subnivean access points for mesocarnivores such as Fisher and American Marten. An inventory of the types and sizes of downed woody material should be included in the treatments.

When planning to burn unnaturally high fuel loads (i.e. logging slash), it is important to leave a range of downed woody material on the ground in appropriate areas in order to preserve insect and wildlife species diversity.

Visual Quality Objectives

The Forest Service needs to objectively compare the alternatives regarding visual quality objectives. Although dead and dying trees would still remain visible with less harvesting, the Forest Service needs to consider that when the needles drop off the red crowns will be replaced by much less striking bare limbs. The Red Tree Fuels Reduction Project in the Sawtooth NRA cites this fact as a reason to leave many stands intact. In areas that are not logged, natural regeneration (through forest successional cycles) will also replace the forest where trees have been killed by mountain pine beetles without the negative association with clearcuts.

Response 14-160. wildlife, snags

Table II-3, Project Design Measures Item 34 (DEIS page II-16) states “Snags and snag replacement green trees would be retained in numbers consistent with Regional Guidelines (Appendix F). No large snags (>15”), other than lodgepole pine, would be removed. All large ponderosa and western larch trees and snags would be maintained. Meeting the Regional Guidelines assures Forest Plan Appendix N is also attained.

The target numbers of snags retained per acre used as an objective is from the Forest Plan, Appendix N-3, and specific project implementation guidelines for the project follow the “Northern Region Snag Management Protocol”, in the project file. (See DEIS II-16, item F, and Appendix F.)

Response 14-161. wildlife, snags, fisher marten, inventory

Over the next 10-20 years many thousands of acres of unharvested lodgepole pine will progressively convert to snags, most of which will fall, lean or “jackstraw” forming excellent subnivean habitat. Given the vast amount of dead and dying lodgepole pine in the analysis area (about 95,000 acres) and the fact that planned treatment acreage would treat 6% (at most) of the local landscape, important subnivean habitats formed by fallen snags in untreated dead and dying lodgepole pine will dwarf present amounts of this habitat condition, which would make an inventory at this time a relatively meaningless activity. Species such as pine marten and fisher, which are sensitive to canopy cover reductions, may not use the abundant subnivean habitats associated with snag habitat attrition in lodgepole pine dominated areas until canopy cover conditions are restored.

Response 14-162. fuels, soils, down woody material, wildlife diversity.

See response to Comments 14-160 and 14-161.

Protection of soil, insect and wildlife diversity would be done through design criteria and mitigation. Dead lodgepole pine probably would be whole tree yarded; this would reduce fuel loads that require treatment. Down wood must be left on site to meet minimum numbers and sizes as indicated in Appendix F. Controls on mechanical piling means that piles should be smaller and numerous, not few and large (Table II-3). This should reduce consumption of large wood. Snags and green trees must be left to meet criteria in Appendix F. These would help recruit down woody material into the future and would provide substrate for insects, birds, and small mammals.

Response 14-163. visuals, VQO.

The VQOs specified in the Forest Plan are not similar to those of the Sawtooth National Recreation Area.

The FEIS (Chapter III, Section 3.14), objectively compares the alternatives regarding visual quality objectives. This project is treating less than seven percent of the analysis area. The disturbance process of insect infestation and subsequent mortality is occurring on many of the untreated acres and may be viewed there.

Economics

In addition to analyzing the economic costs and benefits of each alternative in terms of expected timber yield, benefits, and harvest costs, subsequent NEPA documents must factor in the costs to return the watershed to a condition supporting beneficial uses for each alternative and to return the streams to an upward trend. Analyses need to factor in the costs of decommissioning all high-risk roads, rehabilitating degraded areas, losses in the recreation industry resulting from decreased and low-level fish production (including outside of the project area). Analyses also must address the costs associated with preparing the EIS, administering the sale and other administrative costs associated with the planning and preparation of the project. Please include all costs associated with this sale in subsequent NEPA documents.

Further analyses should discuss the impact of the upswing in the timber market and the potential impact on proposed restoration work. At the time of the project's conception, timber prices were extremely low and may have led to limited planning for restoration. With an ensuing rebound in timber prices, additional restoration may be feasible.

The economic analyses should also discuss the use of off-budget funds (i.e. KV, BD, Roads and Trails, etc) in the accomplishment of various components of this proposal.

Any work performed in this watershed will have difficulty paying for itself given the low value of the timber and the high operating costs necessary to mitigate for previous legacy problem. Subsequent NEPA documents should examine the economic effects of a restoration alternative rehabilitating these watersheds so they meet beneficial uses. Healthy watersheds would improve fisheries and benefit outfitters, guides, and supporting recreational industries. One need only examine the name of the drainage, the Clearwater, to remind oneself of what is possible.

Response 14-164. economics, costs & return.

The alternative tables, displaying the projected revenue and cost of implementation, in FEIS, Chapter III, Section 3.18, do incorporate the direct costs of road decommissioning and rehabilitating degraded areas (mine sites, soil restoration, etc.) The indirect effects analysis discusses recreation activity, and an increase in anadromous fish habitat improvement. The costs associated with planning, preparing, and administering the project are normally not included in economic analyses.

Responses 14-165. economics, timber market and restoration.

The economic analysis in FEIS, Chapter III, Section 3.18 is intended to be used as an indicator of value and costs. The true value received can only occur when a timber sale is sold. The economic analysis displays the values and costs available at the time of printing and have been updated from what was displayed in the FEIS.

Responses 14-166. economics. Off-budget funds

The alternative tables, displaying the projected revenue and cost of implementation, in Chapter 3, Section 3.18, display KV and BD costs. The KV costs are displayed as reforestation line items. The BD costs are displayed as line items for broadcast burning, underburning, and excavator pile and burning. The restoration work and costs associated are also displayed in the tables. How this work is to be funded is to be determined.

Response 14-167. economics. Economics of restoration only. See Response 14-164.

Cumulative Effects

The DEIS failed to adequately consider the cumulative impacts of other federal actions in the area on Fisheries, Soils, Wildlife, Management Indicator Species, TE&S Species, Water Quality, Forest Stand Dynamics and other resources. Some of the other projects that should be incorporated in more detail in the Cumulative Effects Analysis include the Eastside Township (BLM), Whiskey-South (BLM and FS), Crooked River Road Demonstration project, Orogrande Defensible Space project, Newsome Creek Defensible Space, Red River Defensible Space, Red River Administrative Sites, Blacktail Fuels, American River Drainage Fisheries (BLM), Buffalo Gulch Culvert Replacement (BLM), Dixie Summit Tree Removal, Crooked River Channel, Genesis Minerals, Red River Hazard Tree Removal, Newsome Creek Channel Restoration, Upper Red River Watershed Restoration project, “This is it” placer mining, EMC #1 placer mines on Newsome Creek, Forestwide Thinning project (scoping notice of March 29, 2004) Red River Campground.

Additional effects analyses are warranted for the historic, current and foreseeable mining activities located throughout the watershed, as these legacy and continuing projects carry significant risks to values and resources within and adjacent to the project area.

Subsequent NEPA documents should include a full listing of projects which have occurred in the recent past (15-20 years), should delineate these projects on a map, and should consider the anticipated versus. actual impacts of the projects. By providing a discussion of the anticipated versus actual impacts of individual sales and projects, the NEPA analysis could provide for an informed discussion and evaluation of the alternatives presented in the Red Pines project. Some of the projects that should be included in the analysis include, but are not limited to: Fitness Timber Sale, Hercules Mine Reclamation, Soda 1 and 2 Rock Pit Restoration, Kirks Fork Allotment, Mallard Allotment, and others.

Given the inextricable relationship of this impressive (yet likely not comprehensive) list of related activities, many of these projects should be analyzed under one comprehensive EIS. The Forest Service also needs to analyze the cumulative effects of the Slims Fire Contingency Fire Line and any other emergency projects that arise.

Response 14-168. cumulative effects.

See response to Comment 14-158.

For water quality cumulative effects, please see response above.

The analysis of cumulative effects was supplemented for all resource areas in the FEIS. See also Section 3.2, Chapter III, FEIS.

Response 14-169. cumulative effects, mining activities.

See Response 14-168.

Additional cumulative effects analysis was completed in the FEIS. See FEIS, Chapter III.

Response 14-170. cumulative effects, past project list.

Please see response 14-168 and 14-169, and Section 3.2, Chapter III, FEIS.

Response 14-171. cumulative effects, past project list.

Please see response 14-168.

The Forest Service needs to analyze the impacts of logging, road construction, mining, construction, travel and management on Bennett property as well as other private and state-owned lands in the watershed.

Other Issues of Concern

Additional issues of concern include a lack of monitoring and discussion of Heritage issues, Wild and Scenic Rivers (existing and proposed), monitoring and evaluation, evaluation of the impacts of the project on management indicator species, the impact of this project on the long term viability of species and the economics of the project.

Response 14-172. cumulative effects, private lands.

A site-specific Biological Evaluation has been prepared for this project and is included with the FEIS. Non-federal activities are included in the cumulative effects section to the BE.

The cumulative effects of activities occurring on private lands are accounted for in the FEIS, to the extent that information has been obtained from 2002 aerial photographs and through field knowledge of the area.

Response 14-173. monitoring, heritage, wild & scenic rivers.

See FEIS, Section 3.15 and 3.16 for analysis relating to Heritage resources and Wild and Scenic Rivers, respectively.

Response 14-174. MIS species.

See Section 3.12 for impacts on management indicator species.

Response 14-175 population viability.

A population viability analysis for fish and wildlife species has been completed and is in the project file.

Response 14-176 economics.

See Section 3.18, Chapter III, of the FEIS.